

Exhibit 10

1 UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI

3 * * * * *
4 *
5 JOSHUA GLASSCOCK * No.
6 * 22-cv-3095-SRB
7 vs. *
8 *
9 SIG SAUER, INC. *
10 *
11 * * * * *

12 VIDEOTAPED DEPOSITION OF THOMAS TAYLOR,
13 Deposition taken at 299 Vaughn Street, Portsmouth,
14 New Hampshire, on Thursday, September 12, 2024,
15 commencing at 9:02 a.m.

16
17 Court Reporter:
18 Pamela J. Carle, LCR, RPR, CRR
19
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23
24
25

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I N D E X
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(Exhibits sent to Huseby, Inc.)

1 THE VIDEOGRAPHER: Good morning. We're
2 going on the record at 9:02 a.m. for the following
3 deposition of Thomas Taylor, 30(b)(6) corporate
4 representative for Sig Sauer, Inc.

5 This is being taken on September 12,
6 2024, at 299 Vaughn Street, Portsmouth,
7 New Hampshire, 03801, in the matter of Joshua
8 Glasscock, on behalf of himself and others
9 similarly situated, versus Sig Sauer, Inc., filed
10 in the United States District Court for the Western
11 District of Missouri, Case No. 22-cv-3095-SRB.

12 My name is Gill Whitney, I'm the
13 videographer. The court reporter is Pam Carle. We
14 are here on behalf of Lexitas Legal. Would you
15 counsel please announce their presence for the
16 record.

17 MR. WILLIAMS: Mike Williams for the
18 plaintiff.

19 MS. GULLIVER: Colleen Gulliver for
20 Sig Sauer and the witness.

21 MS. DENNISON: And Kristen Dennison
22 here on behalf of Sig Sauer as well.

23 THE VIDEOGRAPHER: Thank you. The
24 reporter can swear in the witness.

25 //

1 THOMAS TAYLOR,
2 having been duly sworn,
3 was deposed and testified
4 as follows:

5 EXAMINATION

6 BY MR. WILLIAMS:

7 Q. Good morning, sir. Can you please
8 state your full name for the record.

9 A. **Thomas Taylor.**

10 Q. Good morning, Mr. Taylor.

11 A. **Good morning.**

12 Q. My name is Michael Williams, and I'm a
13 partner at the firm Williams Dirks Dameron in
14 Kansas City, Missouri, and I am here to take your
15 deposition as a corporate representative. I am
16 going to hand you what has been marked as
17 Deposition Exhibit 1.

18 A. **Glasses. Sorry about that. We won't**
19 **get very far without those.**

20 Q. Well, I am new to glass wearing, so I
21 am very cognizant, like, Ah, where are my glasses?

22 MS. GULLIVER: Do you have a copy for
23 me?

24 MR. WILLIAMS: Oh. That's just the
25 notice. We've been using the same one.

1 MS. GULLIVER: Okay. Will you have
2 copies of other exhibits for me or no?

3 MR. WILLIAMS: Yeah.

4 MS. GULLIVER: Okay. Great.

5 (Taylor Exhibit 1 was marked for identification.)

6 **A. Okay.**

7 BY MR. WILLIAMS:

8 Q. Sorry. You've been handed what has
9 been marked as Deposition Exhibit 1. Have you seen
10 that document before?

11 **A. Yes, I have.**

12 Q. That document is just the notice that
13 was sent out in this case that defines certain
14 topics that we want Sig Sauer to produce a witness
15 to testify on the behalf of the corporation.
16 That's all that basically means.

17 **A. Okay.**

18 Q. In this matter you have been designated
19 to address topics 17, 18 and 19. So before we get
20 started, are you prepared to answer questions with
21 regard to those specific topics?

22 **A. I am.**

23 Q. Okay. I skipped over something, but
24 let's jump back for one second. You told us your
25 name, are you currently employed?

1 **A. I am.**

2 Q. And where are you employed?

3 **A. Sig Sauer.**

4 Q. And what is your title at Sig Sauer?

5 **A. Executive vice president, global brand**
6 **development.**

7 Q. And how long have you been the
8 executive vice president of global brand
9 development?

10 **A. Since the second week of June of 2024.**

11 Q. How long have you been employed by Sig?

12 **A. Not quite ten years, so nine years. It**
13 **will be ten years in March of '24.**

14 Q. It will be ten years in March of '25?

15 **A. '25. Sorry, March of '25.**

16 Q. So prior to becoming executive vice
17 president, global brand management, what was your
18 title?

19 **A. Brand development.**

20 Q. I'm sorry, brand development.

21 **A. Yes, sir.**

22 Q. What was your title?

23 **A. I was chief marketing officer and**
24 **executive vice president commercial sales.**

25 Q. I'm sorry, chief vice president and --

1 A. Chief marketing officer and executive
2 vice president commercial sales.

3 Q. And how long were you in that position?

4 A. Since March of -- from March of 2015
5 until June of 2024. So a little over nine years.

6 Q. And what did you do in that position?

7 A. I oversaw the marketing initiatives of
8 the company, as well as the domestic or US
9 commercial sales at the company.

10 Q. And I assume that becoming the
11 executive vice president of global brand
12 development was a promotion?

13 MS. GULLIVER: Objection, form.

14 A. Just a different role.

15 BY MR. WILLIAMS:

16 Q. So was it a lateral move?

17 MS. GULLIVER: Objection to form.

18 A. It's -- it was just a different role.
19 I talked to the company about doing a different
20 role within the company and they were able to
21 accommodate that role.

22 BY MR. WILLIAMS:

23 Q. Okay. So what do you do -- what are
24 your main job duties as the vice president of
25 global brand development?

1 **A.** So I still support our chief marketing
2 officer in any way he needs. I also am involved in
3 international marketing, special projects, industry
4 governance, various things like that in support of
5 the company.

6 Q. Have you ever had your deposition taken
7 before?

8 **A.** I have.

9 Q. And have you had your deposition taken
10 as a corporate representative before?

11 **A.** I have.

12 Q. Approximately how many times have you
13 had your deposition taken as a corporate
14 representative?

15 **A.** Three prior to this one, I believe.

16 Q. Okay. So you're a veteran at this, but
17 I'm going to go over some basic rules just to make
18 sure that we're all on the same page, is that okay?

19 **A.** Of course.

20 Q. You already understand this, you're
21 doing a great job of answering the questions
22 verbally.

23 **A.** Yes.

24 Q. And what I mean is the court reporter's
25 obligation is to take down everything -- every

1 question that I ask, every answer that you give,
2 and any objections that counsel may make. Because
3 of that, everything must be verbal, i.e., you can't
4 say uh-hum or um-um or shake your head, and we also
5 must let each other finish what we're saying. So
6 you've got to let me finish my question before you
7 start your answer, I have to let you finish your
8 answer before I start the next question, and we
9 have to both be mindful that if counsel makes an
10 objection, we have to stop to allow them to make
11 their record, okay?

12 **A. Understood.**

13 Q. The other thing that we have to be
14 mindful of is that the court reporter is making a
15 record, and because of that, we have to make sure
16 that we're speaking while not slowly, we have to
17 monitor whether we're going too fast, because they
18 can only type 250, 300 words a minute, and
19 sometimes we'll get ahead of ourselves.

20 If we do that, the court reporter is
21 not being rude, she might hold up her hand or wave
22 or something just say slow down, I'm having trouble
23 keeping up. All right?

24 **A. Understood.**

25 Q. Also, sometimes questions are going

1 through my head and when they come out of my mouth
2 they may not make sense, they may be jumbled, they
3 may just be stupid.

4 If you ever get a question that just
5 doesn't make sense, you don't understand or
6 anything, will you promise to tell me?

7 **A. I will.**

8 Q. All right. Because I -- while we're
9 here for certain specific topics, I don't want you
10 answering questions you don't understand.

11 **A. Of course.**

12 Q. Because that just belabors the point,
13 and we have to stay here longer.

14 **A. Understood.**

15 Q. I don't think I have anything else with
16 regard to the background stuff.

17 **A. Okay.**

18 Q. If you will flip to question 17. And
19 if you could read that into the record, please.

20 **A. The marketing of the P320 to Missouri,**
21 **including Sig Sauer's analysis of same.**

22 Q. Are you prepared to answer questions on
23 that topic?

24 **A. I am.**

25 Q. What did you do to prepare to answer

1 questions on that topic?

2 A. I met with counsel, I conferred with
3 internal people within the company, and just
4 generally my knowledge of the situation over the
5 past several years.

6 Q. Can you please identify each person you
7 met with internally to prepare to answer
8 question 17?

9 A. Specifically to 17, Jack Morris, who
10 was our manager of e-mail marketing, and counsel, I
11 think I met specific to marketing. I believe
12 that's the only person that -- that I've asked a
13 couple of questions to understand some things with
14 regard to question 17.

15 Q. And I believe you said Jack Morris is
16 in charge of e-mail marketing?

17 A. Yes.

18 Q. Is he a direct report to you?

19 A. No longer. He -- he previously was but
20 does not report to me any longer.

21 Q. Okay. So prior to the second week of
22 June of 2024, Mr. Morris reported to you?

23 A. He reported through another gentleman.
24 He has at times reported directly to me over the
25 years but more recently had a manager between me

1 **and him.**

2 Q. And who is that manager?

3 A. **Chad Laurent.**

4 Q. For the record, can you spell

5 Mr. Laurent's last name, if you know?

6 A. **Yes, L-A-U-R-E-N-T.**

7 Q. And what is Mr. Laurent's title?

8 A. **Director of digital marketing.**

9 Q. Thank you.

10 A. **Yes, sir.**

11 Q. Any other individuals inside the
12 corporation that you spoke with in preparation to
13 answer question 17?

14 A. **No, I don't think so.**

15 Q. Would you read topic 18 into the
16 record.

17 A. **The sale and/or shipment of P320 to**
18 **Missouri, including Sig Sauer's analysis of the**
19 **same.**

20 Q. And did you speak with any individuals
21 to prepare for answering that question?

22 A. **I did. Outside of counsel I spoke with**
23 **Jack Barnes, Adam Asadoorian, and Cory Franks.**

24 Q. You've probably heard this a lot, but
25 there is zero chance I could even say Adam's last

1 name. Is there any way you could give us a close
2 spelling to it?

3 **A. I'll get close, it is an unusual**
4 **spelling. A-S-S-A-D-O-O-R-I-A-N (sic). I might be**
5 **off a double letter there, but I think that's going**
6 **to be close.**

7 Q. You actually spelled it so I can at
8 least, if I have a question, I can phonetically say
9 it.

10 **A. Yes.**

11 Q. So thank you.

12 And is Cory C-O-R-E-Y?

13 **A. No E, just C-O-R-Y.**

14 Q. What is Jack Barnes' title?

15 **A. His current title is senior vice**
16 **president, commercial sales.**

17 Q. What is Mr. Asadoorian's title?

18 **A. Directure -- sorry, director of**
19 **commercial sales analytics, or something very close**
20 **to that.**

21 Q. And then you say Cory Franks, correct?

22 **A. Yes, yes.**

23 Q. What is Cory Franks' title?

24 **A. He's a sales representative. And, I'm**
25 **sorry, I also spoke to a gentleman named Jacob**

1 **Wideman.**

2 Q. And can you spell Wideman?

3 **A. W-I-D-E-M-A-N.**

4 Q. So in Missouri we say Wideman.

5 **A. He lives in Missouri, so...**

6 Q. He does live in Missouri?

7 **A. Uh-hum.**

8 Q. What part?

9 **A. I'm not sure.**

10 Q. Do you know Mr. Wideman's title?

11 **A. He's a sales rep also.**

12 Q. Any other individuals you spoke with in
13 preparation for topic 18?

14 **A. I believe that's all.**

15 Q. All right, thank you. And I believe
16 you also have topic 19. Can you read that into the
17 record?

18 **A. The suggested retail price, actual
19 price and actual cash value of the P320 before and
20 after a P320 has been modified with a voluntary
21 upgrade.**

22 Q. Did you speak to any individuals in
23 preparation to answer topic 19?

24 **A. I think with regard to that one, that
25 would have just been counsel. And I do believe**

1 there's another document where some of these have
2 had some suggested modifications from our counsel
3 as well. I've reviewed that document.

4 Q. I'm sorry, I didn't understand your
5 answer. Can you say that again?

6 A. Well, you're asking me if I prepared
7 for these topics, and while I have, there's -- I
8 think there's some modifications suggested by our
9 counsel that I've read as well. So similar, but
10 there are objections I think within those -- the
11 other documents, so I prepared for that.

12 MR. WILLIAMS: I don't understand
13 anything.

14 MS. GULLIVER: He's -- I can represent
15 I think what he's referring to is we modified
16 some of -- each one of these to say what we would
17 agree to put him up for, and you're just showing
18 him your deposition notice instead of our
19 objections and responses to it. So he's explaining
20 that these categories are modified by our
21 objections and responses.

22 MR. WILLIAMS: Was there a protective
23 order or anything? I don't -- I didn't --

24 MS. GULLIVER: He doesn't --

25 MR. WILLIAMS: I know I'm -- let's go

1 off the record for a second.

2 MS. GULLIVER: Sure.

3 THE VIDEOGRAPHER: Off the record.

4 9:19.

5 (Recess taken.)

6 THE VIDEOGRAPHER: We're back on the
7 record, 9:28. Media No. 2. Please proceed.

8 BY MR. WILLIAMS:

9 Q. You understand that you're still under
10 oath?

11 A. I do.

12 Q. All right. We were talking about topic
13 19, and I believe you told me you spoke with
14 counsel. Did you speak with any other individuals
15 in preparation for topic 19?

16 A. I did speak with Jack Lawrence a little
17 bit about topic 19.

18 Q. Anyone else?

19 A. No.

20 Q. Did you review any documents in
21 preparation to respond to topic 19?

22 A. No, I did not.

23 Q. Did you review any documents in
24 preparation for topic 18?

25 A. I did.

1 Q. What documents did you review?

2 A. Sales report.

3 Q. And when you say sales report, what do
4 you mean?

5 A. Just the reporting of sales of 320 into
6 the state of Missouri.

7 Q. Do you recall for what years?

8 A. I believe it was during the period I'm
9 being questioned about.

10 Q. Any other documents to prepare or
11 respond to topic 18?

12 A. No.

13 Q. Did you review any documents in
14 preparation for topic 17?

15 A. I did.

16 Q. What documents did you review?

17 A. I saw some marketing collateral such as
18 ads, website pages, things of that nature.

19 Q. And what do you mean when you refer to
20 marketing collateral?

21 A. Collateral is a term that -- kind of
22 all inclusive of advertisements, websites, anything
23 that has to do with the different aspects of
24 marketing that we do.

25 Q. And you said you reviewed ads, and then

1 you had a -- I didn't understand the third
2 category?

3 **A. Website pages. Ads, website pages. I**
4 **believe that was the only two I was specific about.**

5 Q. Any other documents you reviewed other
6 than marketing collateral, ads and website pages?

7 **A. No. I'm sorry, I did review catalog**
8 **pages as well, sorry.**

9 Q. No problem. And what do you mean by
10 catalog pages?

11 **A. It's a product catalog.**

12 Q. Internal documents?

13 **A. Both internal and external, customer**
14 **facing.**

15 Q. And, I'm sorry, when I say -- let me
16 try that question again. When you say catalog
17 pages, were those catalog pages created by
18 Sig Sauer, or were they, you know, someone else's
19 ads like, I don't know, Bass Pro?

20 **A. These would have been created by Sig.**

21 Q. Any other documents you reviewed that
22 we haven't discussed to prepare for category 17, 18
23 or 19 other than marketing collateral, ads, website
24 pages, catalog pages and sales reports?

25 **A. Not that I recall.**

1 Q. With regard to Sig Sauer's marketing
2 P320 in Missouri, did you do -- or did Sig perform
3 any type of analysis of the market?

4 MS. GULLIVER: Objection to form.

5 A. Are you asking specifically about the
6 state of Missouri?

7 BY MR. WILLIAMS:

8 Q. Yes.

9 A. No.

10 Q. Does Sig perform marketing analysis?

11 MS. GULLIVER: Objection, form.

12 A. What type of market analysis are you
13 referring to?

14 BY MR. WILLIAMS:

15 Q. I guess that's what -- yes. That's
16 kind of like why I was like, wait, maybe I'm just
17 using the wrong phrase or term.

18 Does Sig perform any analysis of say
19 like, Here's where we would be best suited to sell
20 our products in the state of Missouri?

21 A. I would think the answer to that
22 question would be no. Not specifically that kind
23 of analysis.

24 Q. What types of analysis does Sig do
25 before selling products in a state?

1 **A. We don't really do a lot of**
2 **state-specific analysis, to be honest.**

3 Q. When you said a lot, does that mean you
4 don't do any?

5 **A. I would say the only analysis we do**
6 **state by state is at times we look at market share,**
7 **of what Sig's market share is in a given state so**
8 **we can understand if it's higher or lower than our**
9 **average.**

10 Q. And when Sig looks at its market share,
11 is that something that's performed on a quarterly
12 basis, an annual basis, or just randomly?

13 MS. GULLIVER: Objection, form.

14 **A. We get -- we get the data on a monthly**
15 **basis, but we don't always analyze it on a monthly**
16 **basis. There's no set time period we analyze it**
17 **on.**

18 BY MR. WILLIAMS:

19 Q. And when you say you get data on a
20 monthly basis, what data does Sig receive on a
21 monthly basis?

22 **A. BATF data.**

23 Q. And just so the record is clear, what
24 is the BATF data?

25 **A. Bureau of Alcohol Firearms and Tobacco.**

1 Q. And is there a department or group that
2 is set up to analyze that data?

3 A. Yes.

4 Q. What is that group called?

5 A. Our commercial sales analytics team.

6 Q. And if you know, who is the head of the
7 commercial analytics team?

8 A. Adam Asadoorian.

9 Q. And I believe we already have that
10 spelling, as close as we're going to get it,
11 correct?

12 A. Yes.

13 Q. So when you were in the chief marketing
14 role, what type of information or data would
15 Mr. Asadoorian provide you with regard to the
16 Missouri market?

17 A. Only a list, there's nothing
18 specifically pulled out for Missouri, it would just
19 be a list of states that would show their market
20 share across all 50 states.

21 Q. And would that data also tell you the
22 number of units that were sold in Missouri?

23 A. No.

24 Q. And so when you say market share, is it
25 just --

1 **A.** **I'm sorry, yes, it would. Some of our**
2 **reports are revenue, some are -- are units. That**
3 **one would be units. So, yes. Yes.**

4 Q. Okay.

5 **A.** **Sorry.**

6 Q. And so that report would show you the
7 number of units that were sold in Missouri on any
8 given month, correct?

9 **A.** **Correct.**

10 Q. And you also mentioned that sometimes
11 the market share is based on revenue, is that
12 correct?

13 **A.** **It is.**

14 Q. And would that show you the revenue
15 that Sig was receiving from Missouri on any given
16 month?

17 **A.** **Not that data, no.**

18 Q. What data would show you the revenue
19 that Sig was receiving from Missouri sales of --
20 and I just realized something. Let me back up for
21 a second.

22 **A.** **Uh-hum.**

23 Q. When we talked about the BATF data and
24 that it would show you the number of units that
25 were sold?

1 **A. Yes.**

2 Q. Were you talking about -- would it tell
3 you the number of P320 units that were sold?

4 **A. No.**

5 Q. It only tells -- does it -- is that --
6 is -- so the data that you would receive in that
7 report is only specific to the number of guns sold,
8 not any specific product line, is that correct?

9 **A. Yes.**

10 Q. Is there a data report that you
11 would -- that tells you the number of units of
12 P320s that would have been sold in Missouri?

13 MS. GULLIVER: Objection to form.

14 **A. We do -- we could track that by unit**
15 **and revenue with internal sales reports for direct**
16 **customers in Missouri.**

17 BY MR. WILLIAMS:

18 Q. Okay. Say that again.

19 **A. We can track revenue and units of -- by**
20 **product line, P320 for example, going into Missouri**
21 **for our customers who buy from us directly in**
22 **Missouri. And when I say customers, I mean**
23 **distributors, dealers, not consumers.**

24 Q. So if I'm understanding you, what
25 you're saying is those numbers would be based on

1 units sold to -- sold commercially, i.e., to
2 dealers or the Bass Pros, commercial retail sales
3 like that, but not to specific Missouri residents,
4 is that correct?

5 **A. Yes.**

6 Q. Is there any report that you're aware
7 of that would tell you the number of units that
8 were sold to individuals, separate from this report
9 we just talked about that -- units sold to Missouri
10 residents as individuals?

11 MS. GULLIVER: Objection to form.

12 **A. Not those -- none of those reports**
13 **would tell us that. We have some very limited**
14 **direct sales to consumers on our website. It's a**
15 **custom -- custom gun builder, so to speak, and**
16 **those we can track that, but it's a very, very low**
17 **volume.**

18 BY MR. WILLIAMS:

19 Q. Okay. So if I'm understanding your
20 testimony, the primary mechanism for sales of P320s
21 in Missouri would be to distributors and commercial
22 entities, is that correct?

23 **A. Yes.**

24 Q. And that there would be very few that
25 were sold directly to consumers in Missouri?

1 **A. Yes, that's accurate.**

2 Q. And the reports that you could -- that
3 would be generated for the sales to the commercial
4 and the distributors could tell you the number of
5 units and it could tell you the amount of revenue
6 on a monthly basis, is that correct?

7 **A. Yes.**

8 Q. Now, we've talked about the sales. I
9 want to talk to you about marketing, i.e., ad buys
10 and things of that nature, okay?

11 **A. Yes, sir.**

12 Q. Does Sig Sauer have -- does Sig Sauer
13 buy ads or -- I'm sorry, I should say
14 advertisements that are sent to consumers in
15 Missouri?

16 MS. GULLIVER: Objection to form.

17 **A. Not specifically in Missouri, no.**

18 BY MR. WILLIAMS:

19 Q. And does Sig Sauer buy advertisements
20 that are just sent out to consumers?

21 **A. Yes.**

22 Q. And what forms of advertisement does
23 Sig send out to consumers?

24 **A. So we do print advertising, television**
25 **advertising, social media are the primary vehicles.**

1 Q. And what type of print advertising does
2 Sig do?

3 A. Just page ads in magazines.

4 Q. Can you give us a -- the top five
5 magazines that you would advertise in?

6 A. Some of the top three would be Guns &
7 Ammo Magazine, Recoil. A lot of the ads we buy are
8 by ownership names and so they -- how they get put
9 out there is -- it's hard to determine the top
10 five, but those are probably the top -- the top
11 couple, would be Guns & Ammo and Recoil.

12 Q. Okay. And then when you say you buy
13 them by advertiser, you mean like you have a --
14 with Hearst or something?

15 A. Yes. Not Hearst, but something like
16 that.

17 Q. Okay. What groups would that be?

18 A. Athlon is one ownership group, Outdoor
19 Sports Group. Those are the two primary, the
20 biggest.

21 Q. And then those groups own different
22 magazines, newspapers, whatever?

23 A. Yes.

24 Q. And so you're doing a general ad buy?

25 A. Yes.

1 Q. And there's no limitation on that
2 general ad buy that says you can't run these ads in
3 Missouri, correct?

4 A. I can't speak to whether they can do a
5 state-specific ad, I don't know whether they can or
6 whether they can't, but we do not, we only buy
7 national ads.

8 Q. You said you also advertise on TV?

9 A. Yes.

10 Q. What type of TV -- what TV mediums do
11 you advertise on?

12 A. We don't do as much TV as we used to do
13 because it's not a primary medium anymore, as you
14 know. But the hunting shows on television.
15 Buckmasters is one we still buy. We do some what's
16 called run of press, where we'll go into the
17 Outdoor Network, which is like the Athlons and the
18 Outdoor Sports Group, but the TV version of that
19 where we'll run a press, where we'll buy ads and
20 then it just runs on the channel, so it doesn't
21 necessarily run on a particular show. So those are
22 the -- those are the primary vehicles that we do on
23 TV and print.

24 Q. What about advertising buys on social
25 media? What are your primary advertisings on

1 social media?

2 A. So, being a gun company we can't really
3 buy ads on social media, so when I say we're using
4 social media for marketing, it's our Instagram
5 pages, our Facebook pages, our YouTube channels,
6 and then we work with a lot of ambassadors and
7 influencers on social media to talk about Sig
8 products.

9 Q. Any other media that you advertise on
10 that we haven't discussed?

11 A. No.

12 Q. Do you do any type of cobranding or
13 advertising with, like, say, a Bass Pro?

14 A. Yes.

15 Q. What do you do with -- what type of
16 advertising or cobranding do you do with Bass Pro?

17 A. They'll run ads and they'll collaborate
18 with us for logos and pictures of our products.
19 They have -- throughout the year they have a couple
20 special events in their advertising that they do
21 and we collaborate with them for a half-page ad or
22 something like that.

23 Q. Same thing with Cabela's?

24 A. Yes. And those are national, not --
25 not state-specific.

1 Q. Bass Pro is out of Springfield,
2 Missouri, correct?

3 A. Yes.

4 Q. Now, does Sig do any counter-marketing?
5 I.e., there's a story going on that says the P320
6 goes off without you touching the trigger, and then
7 there are obviously stories that run that say
8 that's not true. Does Sig participate or do any
9 marketing to counter stories that may be adverse to
10 their products?

11 MS. GULLIVER: Objection to form.

12 A. I'm not sure I would exactly call it
13 marketing, but, yes, we do counter those things.

14 BY MR. WILLIAMS:

15 Q. Okay. Well, I'm the guy that wants to
16 use a term that you're comfortable with, so what
17 would you call that?

18 A. I think we try to make statements and
19 so forth to make sure our point of view is on the
20 record.

21 Q. Do you have a name that you refer to
22 that as?

23 A. No.

24 (Taylor Exhibit 2 was marked for
25 identification.)

1 BY MR. WILLIAMS:

2 Q. I'm going to hand you what's been
3 marked as Exhibit 2.

4 A. Okay.

5 Q. If you look at the second page of 22,
6 which is Sig Glasscock 00000248. That's an e-mail
7 from you, correct?

8 A. Yes.

9 Q. And that's dated 6/8/2018 at 12:32
10 p.m.?

11 A. Yes.

12 Q. Did you -- and if you look at the first
13 page, did you draft this document?

14 A. I wouldn't have individually drafted
15 it, I would have been involved in the drafting of
16 this.

17 Q. I'm sorry, say that again?

18 A. I would have been involved in the
19 drafting of this.

20 Q. And when you said that there's, you
21 know, statements to make sure Sig's point of view
22 is on the record, is this the type of article you
23 mean, or the type of statement you mean?

24 MS. GULLIVER: Objection to form.

25 A. Not necessarily. This is -- this is a

1 communication to our bank to let them know. So it
2 would be part of that, but this is -- this wasn't
3 public facing, necessarily, this was just sort of a
4 record to our bank to let them know about this CNN
5 article that was potentially coming.

6 BY MR. WILLIAMS:

7 Q. And do you recall if this was just sent
8 to your bank, or was it sent to multiple groups?

9 A. I don't know if this format or version
10 exactly was sent -- who this was sent to besides
11 our bank.

12 (Taylor Exhibit 3 was marked for
13 identification.)

14 BY MR. WILLIAMS:

15 Q. I'm going to hand you what has been
16 marked as Exhibit 3.

17 A. Okay.

18 Q. Now, did you play a part in drafting
19 this document?

20 A. I did.

21 Q. And was this document forward-facing,
22 or was it to your bank or someone like that?

23 A. I believe this would have been an
24 outward-facing document.

25 Q. And so is this what you meant when you

1 said statements to make sure your point of view is
2 on the record?

3 **A. Yes.**

4 Q. And this addresses an issue that
5 occurred with the Canadian Special Forces Operation
6 Command -- Canadian Special Operations Forces
7 Command?

8 **A. Yes.**

9 (Taylor Exhibit 4 was marked for
10 identification.)

11 BY MR. WILLIAMS:

12 Q. I'm going to hand you what has been
13 marked as Exhibit 4.

14 MR. WILLIAMS: I'm sorry, I stapled the
15 extra copy. Do you want me to staple that one?

16 MS. GULLIVER: What do you mean?
17 What's attached?

18 MR. WILLIAMS: No, what I'm saying is
19 the copy I have for you is stapled. That one's
20 not. I try to keep them consistent. If you don't
21 care -- okay.

22 MS. GULLIVER: Well, I appreciate that,
23 but, no, I'm good. Thank you.

24 MR. WILLIAMS: I always bring a
25 stapler, but sometimes my brain doesn't work right.

1 MS. DENNISON: And I hate to interrupt,
2 but since you're talking. If these documents,
3 because I'm remote, if these documents are Bates
4 labeled, if you could identify them by the Bates
5 label, that would be really helpful for me.

6 MS. GULLIVER: I'm happy to read
7 Exhibit 2 and 3 in, if that's okay?

8 MR. WILLIAMS: Yes.

9 MS. GULLIVER: But I think we also need
10 to -- for some reason this one's cut off on Exhibit
11 4.

12 MR. WILLIAMS: Yes.

13 MS. GULLIVER: So Exhibit 2 is Sig
14 Glasscock 00000248 and 247, and then Exhibit 3 is
15 Sig Glasscock 00000199 to 200.

16 And then do you know what Exhibit 4 is?

17 MR. WILLIAMS: I do not have the
18 document number. Whoever, when they printed it or
19 copied it at the Kinkos, I guess they cut it off.

20 MS. DENNISON: Okay. I've seen that
21 happen before.

22 MR. WILLIAMS: Yes. But what --

23 MS. DENNISON: It happened to me last
24 week in a deposition I was doing, but thank you
25 very much, I appreciate it.

1 MR. WILLIAMS: So -- but if you don't
2 mind, I'll be back in Kansas City tomorrow.

3 MS. GULLIVER: Great.

4 MR. WILLIAMS: And so I can shoot you
5 an e-mail that says, Hey, Exhibit 4 was this
6 document.

7 MS. GULLIVER: That would be great,
8 thank you.

9 MS. DENNISON: Thank you.

10 MR. WILLIAMS: I have to make myself a
11 note, or I'll forget.

12 BY MR. WILLIAMS:

13 Q. I'm sorry, we sidetracked you. Did you
14 get a chance to look at Exhibit 4?

15 A. I did.

16 Q. And Exhibit 4 is a document from
17 Samantha Piatt dated July 27 of 2021 at 4:51 p.m.,
18 correct?

19 A. Yes.

20 Q. And it is being sent from her to you?

21 A. Yes.

22 Q. And it just says, With options, is the
23 subject, correct?

24 A. Yes.

25 Q. Did Ms. -- am I saying that right,

1 Piatt?

2 A. Yes.

3 Q. Okay. Did Ms. Piatt report to you?

4 A. Yes.

5 Q. And did you ask her to draft this
6 document?

7 A. I don't know if ask would be the exact
8 right way to put it. When we're in one of these
9 situations we would meet, you know, collaboratively
10 decide what we were going to do, so it would have
11 been a collaborative discussion, most likely.

12 Q. And this is dealing with -- I guess the
13 attachment says 7/26/21 ABC statement 5.docs,
14 correct?

15 A. Uh-hum. Yes, sir.

16 Q. And if we look at the second page,
17 which I apologize, we don't have a Bates number
18 for, it says statement of 07/27, Option 1, news.
19 And it goes through a statement, We are
20 disappointed but not surprised that a liberal
21 antigun media outlet like ABC has chosen to report
22 and sensationalize frivolous lawsuits being
23 propagated by trial lawyers as newsworthy.

24 Did I read that accurately?

25 A. Yes.

1 Q. So Option 1 means -- and it says news.
2 Does that mean you were going to send it to news
3 outlets, or what does that mean?

4 MS. GULLIVER: Objection, form.

5 A. No, it just meant Option 1 was if we
6 chose to talk about the fact that this was reported
7 by a news outlet that might have an agenda, that's
8 the opening we would use.

9 BY MR. WILLIAMS:

10 Q. And so is it Sig's position that ABC
11 News is antigun media?

12 MS. GULLIVER: Objection to form.

13 A. That's our belief.

14 BY MR. WILLIAMS:

15 Q. And then Option 2 says, Trial lawyers.
16 Once again, this lawsuit is a result of unsupported
17 allegations and claims being propagated by trial
18 attorneys seeking personal financial gain for a
19 negligent discharge caused by the (insert officer,
20 if LE) mishandling and/or misuse of a firearm.

21 Did I read that accurately?

22 A. Yes.

23 Q. What does LE stand for?

24 A. Law enforcement.

25 Q. So Option 2 is -- Option 1 says ABC is

1 an antigun media outlet, correct?

2 **A. Yes.**

3 Q. Option 2 says that it's unsupported
4 allegations or claims being propagated by trial
5 attorneys seeking personal financial gain, correct?

6 MS. GULLIVER: Objection, form.

7 **A. Yes.**

8 BY MR. WILLIAMS:

9 Q. And then there's an option 3 that says
10 Glock. Who is Glock?

11 **A. Glock is a firearms company.**

12 Q. And it's one of your competitors?

13 **A. Yes.**

14 Q. And Option 3 reads, We are not
15 surprised that our competitor has decided to
16 participate in sensationalizing false claims that
17 seek to undermine the success of the P320.

18 This is nothing more than an act of
19 desperation due to their inability to prove
20 themselves in a head-to-head match-up with us.
21 Correct?

22 **A. Yes.**

23 Q. So did you believe Glock had something
24 to do with the ABC story?

25 **A. What these three options were we're**

1 simply early in the process understanding what was
2 going on with whichever situation this was.

3 You know, news is involved in reporting
4 something that was sensationalized. You know,
5 trial lawyers approaching law enforcement officers,
6 and we had intel at times that our competitor was
7 out sharing, propagating news reports with police
8 departments and such that there were allegations
9 against the 320.

10 So -- but this document, it was just us
11 capturing our thoughts as to which way we might go
12 with it, depending on what we ultimately found out
13 about the situation.

14 Q. So Option 1, blame the news, Option 2,
15 blame the trial lawyers, Option 3, blame Glock,
16 correct?

17 MS. GULLIVER: Objection to form.

18 A. No, we were not looking to place blame,
19 we are considering all of our options in terms of
20 where and how the allegations were being
21 propagated.

22 BY MR. WILLIAMS:

23 Q. Are there any other news outlets -- are
24 there any major news outlets that Sig does not
25 believe is antigun media?

1 MS. GULLIVER: Objection, beyond the
2 scope. You can answer in your personal capacity.

3 A. I think there are outlets that are more
4 or less favorable to guns, but we're -- I would say
5 we're cautious with all media. Even ones that are
6 more conservative, we're cautious with all.

7 MS. GULLIVER: Mike, we've been -- oh,
8 I'm sorry, are you done questioning on this?

9 MR. WILLIAMS: Sorry. I have weird
10 facial ticks that I don't notice. My significant
11 other tells me I speak with my face. I was just
12 thinking.

13 MS. GULLIVER: Okay. But I was going
14 to ask for a break, but if you're not done with
15 this document, I don't want to get --

16 MR. WILLIAMS: Oh, no. I am a fan of
17 breaks. I don't want to keep you here all day,
18 so -- but if we need to take a break, we can take a
19 break.

20 MS. GULLIVER: Just a short one, if
21 that's okay.

22 MR. WILLIAMS: Oh, yes.

23 THE VIDEOGRAPHER: Off the record,
24 10:05.

25 (Recess taken.)

1 (Taylor Exhibit 5 was marked for
2 identification.)

3 (Taylor Exhibit 6 was marked for
4 identification.)

5 THE VIDEOGRAPHER: We are back on the
6 record 10:19, media No. 3. Please proceed.

7 BY MR. WILLIAMS:

8 Q. You understand that you're still under
9 oath, correct?

10 A. I do.

11 Q. Okay. In front of you are Exhibits 5
12 and 6, and I believe 5 is -- at the top says Copy
13 of Sig Glasscock 0001772.

14 A. Okay, yes.

15 Q. Okay. I will represent to you that
16 this was so big that I only printed off like the
17 first page, or else we'd have like 4,000 pages for
18 no apparent reason.

19 And what I am particularly interested
20 in, in talking, so that you don't worry about it,
21 is I want to talk to you about the explanation
22 page.

23 A. Okay.

24 Q. All right. And so you recall earlier
25 you gave testimony about units being sold and how

1 you, you know, you sell to the distributor and
2 that's how you know what units are sold in Missouri
3 and what percentage of market share?

4 **A. Yes.**

5 Q. Okay. I believe this helps us
6 understand that, and so that's why I pulled this
7 out. If we look at the key, the first one says
8 Ship date range. And at least for this document it
9 says, Between 01 September of '17 and 18 April of
10 '22, correct?

11 **A. Yes.**

12 Q. Tell me what that means, the ship
13 range.

14 **A. It's just the date range the report was**
15 **pulled.**

16 Q. And those are just variables that you
17 add in?

18 **A. Yes.**

19 Q. Okay. And that would be shipments to
20 Missouri?

21 **A. Yes.**

22 Q. Okay. Then the next -- it says, next
23 category, Ship to customer category code. And then
24 it has a bunch of stuff. What does that tell us?

25 **A. Here where it says not in, it's just**

1 telling you what's been excluded from this report,
2 all these different categories within Sig Sauer.

3 Q. And so if you take all those categories
4 out, then that would leave the number of commercial
5 sales in Missouri, or what would it leave?

6 A. It would leave all the commercial sales
7 in Missouri with the exception, when we were
8 reviewing this data yesterday, conservation, the
9 last one here is a consumer sale. So we did -- I
10 think we are having that added back in.

11 Q. Okay. So other than conservation,
12 these are categories of things or categories of
13 sales that are not to the distributors and the
14 retailers that sell to consumers, correct?

15 A. True.

16 Q. And that's limited to Missouri,
17 correct?

18 A. Yes.

19 Q. The next one says Value type fin. I
20 have no idea what that means?

21 A. I'm not exactly sure what that means.

22 Q. Okay. The next one says Part equals
23 H-D-G-U-N, so I'm assuming that's handgun?

24 A. Yes.

25 Q. And then the next category is Model,

1 which tells us only P320. So I am to understand
2 that this chart has singled out P320 handgun sales
3 to retailers that sell to consumers in Missouri?

4 MS. GULLIVER: Objection to form.

5 **A. Retailers and distributors.**

6 BY MR. WILLIAMS:

7 Q. Oh, I'm sorry, I left off distributors.

8 **A. Yes.**

9 Q. Okay. So retailers and distributors
10 that sell handguns to Missouri and that it's
11 limited to just P320, correct?

12 MS. GULLIVER: Objection to form.

13 **A. Yes.**

14 BY MR. WILLIAMS:

15 Q. And we know that because the next one
16 says state is Missouri, correct?

17 **A. Yes.**

18 Q. And the line category code means all.
19 Tell us what that means.

20 **A. I'm not sure.**

21 Q. What about source system?

22 **A. Source system, Sig Sauer Oracle EBS is**
23 **just our mainframe system that all of our sales**
24 **data gets pulled into. So it's being pulled from**
25 **that system.**

1 Q. Okay. And how long -- if you know, how
2 far back to go with the Oracle system?

3 A. We've had Oracle since I've been at
4 Sig Sauer.

5 Q. Okay, perfect. And then it says Order
6 type. And can you explain that? Because I know it
7 looks like another exclusion.

8 A. Yeah. Not in -- we're not including,
9 for example, T&E is a test and evaluation order,
10 which might mean we've sent it to a writer, a media
11 member, which is test and evaluation.

12 Warranty and repairs, if you pull this
13 without excluding those, it would -- it would track
14 a gun that was sent in to Sig by a consumer and
15 sent back to a consumer. So we've excluded
16 anything that wouldn't be a new gun sale into the
17 state.

18 Q. And then the last one, is that -- what
19 does -- C-U-S-T-S-V-E-C-E, what does that stand
20 for?

21 A. Sorry. I see business group.

22 Q. No, no, no. I'm sorry. At the end of
23 the --

24 A. Oh, I'm sorry. That's customer service
25 order type.

1 Q. What does that mean?

2 A. So customer service is -- same thing,
3 it's all -- those are all part of the warranty,
4 customer service.

5 Q. Oh.

6 A. If a customer calls customer service,
7 has to transact a gun being repaired and sent back,
8 it would exclude any of those kinds of order --
9 order types.

10 Q. And then it says Business group, and it
11 excluded these. What is that?

12 A. So it's just telling you that it's
13 commercial sales, it's excluding law enforcement,
14 military, government, international export, and so
15 on.

16 Q. Okay. And then if we just go to the
17 next page. When we look at those categories it
18 kind of lays them out as to even further, like
19 which city it went to, the ZIP code, you know, all
20 of those things, correct?

21 A. Yes.

22 MS. GULLIVER: Objection, form.

23 BY MR. WILLIAMS:

24 Q. And then if we look at the third page
25 in category H it actually has the date that the

1 product was shipped, the item number and a
2 description, correct?

3 **A. Yes.**

4 Q. And then the last page just has the
5 serial number, correct?

6 **A. Yes.**

7 Q. And so this is a way that you could see
8 how many handguns -- how many P320 handguns were
9 sold in Missouri to retailers and distributors?

10 MS. GULLIVER: Objection to form.

11 **A. Commercial. Commercial retailers and**
12 **distributors, yes.**

13 BY MR. WILLIAMS:

14 Q. Okay.

15 MS. GULLIVER: Same objection.

16 BY MR. WILLIAMS:

17 Q. And just out of curiosity, do you know
18 why the date of April 18 of 2022 is selected?

19 **A. I don't know specifically if that's the**
20 **date range I was asked to prepare for.**

21 Q. Okay. If we look at No. 6 -- oh, I'm
22 sorry. If we look at -- I'm getting too
23 comfortable with you. You've got just such a nice
24 demeanor.

25 If you look at Exhibit 6, what is

1 this -- how is this chart different than the one we
2 just looked at?

3 A. I believe this was a first version that
4 we pulled that just had to be -- we had to ask more
5 questions and make sure it was giving -- giving you
6 what you were looking for.

7 This one does not have the customer
8 name, for example, the dealer or distributor it was
9 sent to, so I think we just -- in Exhibit 5 I
10 believe we just expanded our fields to make sure it
11 was giving you the right information.

12 Q. Okay. So if I'm short-circuiting this,
13 can I say that Exhibit 5 is a more detailed
14 analysis of the information in Exhibit 6?

15 A. I believe it is.

16 Q. Okay. And I think your prior answer
17 eliminates this category, and -- Matt's finally
18 calling back. Sorry, I'll put this phone in my
19 pocket.

20 I believe you've already answered this,
21 so I just want to make sure. The document that we
22 looked at and that information is what you would
23 consider your -- would be the analysis information
24 that you would look at when we're talking about
25 sales and Missouri, correct?

1 MS. GULLIVER: Objection to form.

2 A. I don't think the -- I think the answer
3 is not exactly because I -- we don't -- I don't
4 look at information this way. Just in my analysis
5 I wouldn't look at it by store or by the state, but
6 it's the database we use to analyze data, but I
7 wouldn't look at it this way, no.

8 BY MR. WILLIAMS:

9 Q. Okay, maybe that's a better way to say
10 it. If I'm understanding your prior testimony, you
11 don't do a state -- you don't look at a
12 state-by-state analysis of sales on a monthly
13 basis, is that correct?

14 A. No.

15 Q. But you have a database that we just
16 looked at that allows you, if you needed to, to
17 refine the sales in a certain state, correct?

18 A. Yes. Sales within a retail or a
19 distributor, but not total sales in the state?

20 Q. Got you. Or I should say shipments in
21 a state, how's that?

22 A. Sig's shipments directly into the
23 state.

24 Q. Okay. See, you just limited a whole
25 category by giving me that, because that was 18.

1 (Taylor Exhibit 7 was marked for
2 identification.)

3 MR. WILLIAMS: I'm going to give you
4 the Bates numbers for these because apparently when
5 they made the copies they didn't -- but this one
6 has it.

7 BY MR. WILLIAMS:

8 Q. So you have been handed Exhibit 7,
9 which is Bates numbered 157 and 158, and that
10 goes -- that's what starts, and I guess they've cut
11 mine off, too, because there was an attachment when
12 they printed it. So I know the first two pages are
13 157, 158, and then these are the attachments that
14 follow.

15 And so if you'd look at Exhibit 7. Is
16 that an e-mail from Samantha Piatt?

17 A. Yes.

18 Q. And it's dated 7/28 of '21 at
19 10:22 a.m.?

20 A. Yes.

21 Q. And this was sent to you?

22 A. Yes.

23 Q. And some other people?

24 A. Yes.

25 Q. And it says the attachments are

1 Sig Sauer P320 news articles?

2 A. Yes.

3 Q. And then below that e-mail is an e-mail
4 for a Gary Wagschal from ABC.com, do you see that?

5 A. I do.

6 Q. And he is asking certain questions and
7 information related to the news articles, correct?

8 A. Yes.

9 Q. And then the attachments are just
10 various news articles about P320 and different
11 incidences?

12 A. Yes.

13 Q. Now, in Mr. Wagschal's message his
14 first sentence talks about that he's a senior
15 producer for ABC, correct?

16 A. Yes.

17 Q. And that he's working on a story for
18 Good Morning America and Nightline about the Sig
19 P320, correct?

20 A. Yes.

21 Q. His next sentence says, According to
22 news reports, lawsuits and eyewitness accounts, it
23 is alleged to misfire, that is the pistol is
24 accused of firing on its own without any -- anyone
25 pulling the trigger. Correct?

1 **A. Yes.**

2 Q. And then in the next paragraph he says
3 that, Attached are a compilation of news articles
4 and TV reports about the alleged problem with the
5 Sig Sauer P320. Correct?

6 **A. Yes.**

7 Q. And he tells you that, That is the
8 scope of their investigation, and that we are not
9 investigating other guns that are associated with
10 Sig Sauer. Correct?

11 **A. Yes.**

12 Q. And the next sentence says, These
13 articles and TV reports should give you a clear
14 idea about our news program -- or what our news
15 programs will be about and what material
16 allegations are involving -- what the material
17 allegations are involving the gun that we are
18 investigating. Correct?

19 **A. Yes.**

20 Q. He says -- next he says, We are
21 currently researching and reporting, but as
22 discussed, in future as we get closer to deciding
23 which alleged victims and other individuals we plan
24 to include in our broadcast pieces, we will give
25 you a timely opportunity to respond to these -- to

1 their specific allegations. Correct?

2 **A. Yes.**

3 Q. And the next paragraph asks for a
4 spokesman from Sig Sauer to talk on camera to our
5 respected, fair and experienced ABC's news
6 correspondent David Scott in a television
7 interview, correct?

8 **A. Yes.**

9 Q. Have you had any dealings with David
10 Scott?

11 **A. No.**

12 Q. Have you ever watched any of his news
13 reports to see kind of if he's fair and balanced?

14 **A. Not that I recall.**

15 Q. And then the next to the last sentence
16 says, Please let us know if this on -- if this on
17 camera with David is a possibility, and if so, when
18 that could occur. We are willing to do the
19 interview at the location and time of your
20 choosing, assuming it works within the production
21 schedule. Correct?

22 **A. Yes.**

23 MS. GULLIVER: Objection to form.

24 BY MR. WILLIAMS:

25 Q. Did you ever speak to Mr. Wagschal?

1 **A. No.**

2 Q. Did you ever speak to David Scott?

3 **A. No.**

4 (Taylor Exhibit 8 was marked for
5 identification.)

6 BY MR. WILLIAMS:

7 Q. I'm handing you what has been marked as
8 Exhibit 8.

9 MR. WILLIAMS: For the record, the
10 first page of the document is Sig 146, and the
11 remainder is just the attachment, but somehow they
12 cut off the number. This is why you don't let Todd
13 make copies.

14 **A. Okay.**

15 BY MR. WILLIAMS:

16 Q. All right. Have you had a chance to
17 review Exhibit 8?

18 **A. I have.**

19 Q. This is an e-mail from Ms. Piatt to
20 you, correct, and some others?

21 **A. Yes.**

22 Q. And it's dated 8/17 of '21 at 2:11
23 p.m.?

24 **A. Yes.**

25 Q. And the subject is Media doc/statement,

1 correct?

2 **A. Yes.**

3 Q. And it just starts out, So the result
4 of my meeting with RC this a.m. was the following.

5 I'm curious about No. 2, and here's my
6 question. It says, Who are we talking to, and then
7 subsection A, Come up with a grid about how we
8 communicate with various constituencies that we
9 would want to address. Do you see that?

10 **A. I do.**

11 Q. And then four pages later there's a
12 grid, and the grid is titled Communications
13 Description, correct?

14 **A. Yes.**

15 Q. And my question -- and it kind of lays
16 out some options, correct?

17 **A. Yes.**

18 Q. Is this the standard communication grid
19 that is done if there's some kind of media
20 communication to go out?

21 MS. GULLIVER: Objection to form.

22 **A. I don't think there's anything**
23 **standard, I think this is a one-off example of how**
24 **to address different channels and constituencies.**

25 BY MR. WILLIAMS:

1 Q. Okay. So this isn't a form that's
2 filled out every time there's an incident or issue,
3 this is just something she did for this specific
4 issue, correct?

5 A. I don't believe the intent was this
6 specific issue, I was thinking what was going on at
7 this time, whether there was one or several issues,
8 I think she was trying to come up with a process
9 that we would have to communicate to different
10 constituencies.

11 Q. Okay. Yes, I was just wondering if it
12 was like, Hey, this is the process we use every
13 time, or if this was just a one-off that she came
14 up with. So thank you very much for that answer.

15 A. Yes, sir.

16 Q. And, see, we can move on.

17 A. Okay.

18 (Taylor Exhibit 9 was marked for
19 identification.)

20 BY MR. WILLIAMS:

21 Q. I'm going to hand you what has been
22 marked as Exhibit 9.

23 A. Okay.

24 Q. Okay, this is a message on -- I'm
25 sorry. This is an e-mail from Kyle Reyes, correct?

1 **A. Yes.**

2 MR. WILLIAMS: And I'm sorry, it's
3 document No. 141 and 142, Sig Glasscock 141 and
4 142.

5 BY MR. WILLIAMS:

6 Q. And this is to you and some other
7 individuals, correct?

8 **A. Yes.**

9 Q. Who is Kyle Reyes?

10 **A. He's a media member and a marketing**
11 **agency owner.**

12 Q. And in 2021 did Sig have a contract
13 with Mr. Reyes?

14 **A. No.**

15 Q. Has Sig hired Mr. Reyes in any capacity
16 to do marketing or...

17 **A. No.**

18 Q. And I know it says that he's the
19 national spokesman Law Enforcement Today; president
20 and CEO, The Silent Partner?

21 **A. Yes.**

22 Q. Has Sig had any contracts with The
23 Silent Partner?

24 **A. No formal contracts, no.**

25 Q. What do you mean formal contract?

1 **A. No contracts with them.**

2 Q. And does Sig advertise with them or
3 something?

4 **A. No. Well, The Silent Partner is not a**
5 **media outlet, that's a marketing agency.**

6 Q. Thank you. Is the Law Enforcement
7 Today, is that a media outlet or is that --

8 **A. That's a media outlet.**

9 Q. Okay. Does Sig advertise with Law
10 Enforcement Today?

11 **A. No.**

12 Q. Okay. The to is to Patrick Droney?

13 **A. Yes.**

14 Q. Does Sig have a relationship with
15 Mr. Droney?

16 **A. No.**

17 Q. And if I could summarize this e-mail,
18 it's Mr. Reyes introducing Mr. Droney to you and a
19 few others at Sig, correct?

20 **A. Yes.**

21 Q. Do you know if Mr. Droney ended up
22 writing an article or collaborating with Sig on an
23 article?

24 MS. GULLIVER: Objection to form.

25 **A. I believe he did write an article, but**

1 he did not specifically collaborate with us.

2 BY MR. WILLIAMS:

3 Q. What do you mean he didn't collaborate
4 with Sig?

5 A. To my knowledge, we never had any
6 formal communications with him about the article,
7 about any articles that he wrote.

8 Q. Did you ever -- did you or anyone on
9 behalf of Sig meet with Mr. Droney?

10 A. No.

11 Q. Did you -- did Sig ask Mr. Reyes to
12 make this introduction?

13 A. This communication was generated from a
14 conversation I had with Kyle Reyes, and he was
15 concerned about the allegations being made and
16 asked if Law Enforcement Today can help. That was
17 the -- that was the context of this document.

18 Q. Okay. Got you. So you were
19 acquaintances with Mr. Reyes?

20 A. Yes.

21 Q. And during a communication Mr. Reyes
22 decided to make this introduction?

23 A. Yes.

24 Q. And you didn't solicit -- you -- Sig,
25 you, on behalf of Sig or Sig did not solicit

1 Mr. Reyes to get an introduction to Pat Droney so
2 he could help you?

3 **A. No.**

4 Q. Okay.

5 (Taylor Exhibit 10 was marked for
6 identification.)

7 BY MR. WILLIAMS:

8 Q. I'm handing you what has been marked as
9 Exhibit 10.

10 MR. WILLIAMS: For the record, this is
11 Sig Glasscock 128, 129, and the attachment that has
12 the -- the attachment to the e-mail that has the
13 numbers off the edge.

14 **A. Okay.**

15 (Discussion off the record.)

16 MR. WILLIAMS: Sorry, we're just
17 coordinating so that we try to not impinge upon
18 your day. I understand you're a busy man and I
19 don't like to impinge upon people's day any more
20 than I have to.

21 **A. All good.**

22 BY MR. WILLIAMS:

23 Q. I've handed you what has been marked as
24 Exhibit 10.

25 **A. Yes.**

1 Q. Exhibit 10 appears to be an e-mail from
2 you to a Mr. Jason Vincent, correct?

3 A. Yes.

4 Q. And that was on 8/28 of '21?

5 A. Yes.

6 Q. And who is Jason Vincent?

7 A. He's a media member.

8 Q. Is he a writer, or is he --

9 A. I believe specifically he's an editor,
10 but, yes, similar vein.

11 Q. And who is he an editor for?

12 A. Field Ethos magazine.

13 Q. What is Field Ethos, if you know?

14 A. It's an outdoor magazine, hunting,
15 shooting. I believe they -- I think they actually
16 get into fishing and some other things like that,
17 but it's an outdoor publication.

18 Q. And here you have -- you forwarded him
19 the ABC statement and a few postings by PEO Soldier
20 and Picatinny Arsenal, correct?

21 A. Yes.

22 Q. Is Field Ethos one of the magazines or
23 brands that you advertise with?

24 A. We were advertising with them at that
25 time, we don't any longer.

1 Q. And do you recall why you sent him this
2 information?

3 A. I believe we had a conversation, and as
4 you see, it says -- it says, Great to catch up with
5 you on so many fronts yesterday. So we would have
6 talked about what was going on with the ABC News
7 and so forth.

8 Q. Okay. But you weren't asking him to
9 write an article or do any advertising related to
10 the response to these stories, is that correct?

11 MS. GULLIVER: Objection to form.

12 A. I believe as just in my normal course
13 of doing my job and talking with media members, a
14 lot of them had reached out to us and said, Hey,
15 what's going on with this? And I would have filled
16 them in and, you know, some said, Can we help, can
17 we write a story about this, whatever, we're going
18 to try to get your point of view out. So there
19 were -- he would have been one of those kind of
20 conversations that I would have had.

21 BY MR. WILLIAMS:

22 Q. Okay. Do you know if Field Ethos did
23 an article getting out Sig's point of view?

24 A. I don't recall exactly, but I do not
25 believe they did.

1 Q. And other than an article do you recall
2 if they did any kind of Facebook or social media
3 post trying to get out Sig's position?

4 A. I don't.

5 Q. In that same document --

6 A. Sorry.

7 Q. Oh, no, no. I remembered a question.
8 It talks about, if you go down four written
9 paragraphs that starts with, Lastly?

10 A. Yes.

11 Q. Please see the info below regarding the
12 SERPA holster the female officer from the ABC
13 report used. Then it says -- did I read that
14 accurately? Sorry.

15 A. Yes.

16 Q. It says, The one she said nothing could
17 get in the trigger guard as she demonstrated how it
18 could. This is completely -- this is a completely
19 different issue that could come into play. What
20 did you mean by that?

21 A. So in the video on ABC News when she
22 was showing the gun in the holster, she held it up
23 and she said, There's no way anything can get in
24 this holster, as she took her finger and slid in
25 the holster. So she said it wouldn't do it, and

1 then she demonstrated on the -- if you watch the
2 interview, she actually slid her finger in the
3 holster, so she demonstrated that something could
4 go in the holster as she was saying it couldn't.
5 So I was just pointing out that that was -- she was
6 contradicting herself in the interview.

7 Q. And was it Sig Sauer's position that
8 this SERPA holster is what caused the unintended
9 firing of the gun?

10 A. No, I don't think it was -- that wasn't
11 our -- we never said the SERPA holster caused it.
12 Our position was the SERPA holster has an opening
13 that would allow for something to get into the --
14 inside the holster and have access to the trigger
15 guard just if you look at the design of the SERPA
16 holster.

17 So our suggestion was that it could
18 have been a reason for something getting inside the
19 trigger guard and pressing the trigger, as opposed
20 to the gun going off by itself, which was the
21 allegation.

22 Q. Because the next one, it said, We
23 learned of many departments and agencies that have
24 banned the use of this holster. That's why I was
25 asking.

1 **A. Yes. It is a holster, because of that**
2 **gap in the holster, it has been banned by a number**
3 **of agencies, they don't like that -- they don't**
4 **like the style of this particular holster.**

5 Q. And then the next thing says,
6 Interestingly we had a manager in our HR department
7 out to dinner last night in a local restaurant and
8 she heard a gun discharge in the restaurant. It
9 was a Glock 43 in a purse.

10 **A. Yes, I see it.**

11 Q. Do you remember who that HR manager
12 was?

13 **A. I don't.**

14 Q. And you say -- the next sentence says,
15 Here's another story similar to many of the claims
16 against Sig, a Glock 43 discharging in a Walmart
17 store.

18 **A. Yes.**

19 Q. Finally at the bottom it says, This is
20 not a gun problem, it's a people problem. Correct?

21 **A. Yes.**

22 Q. Let me know if you need any other
23 information about cops stating, My gun magically
24 went off, close quote. What did you mean by that?

25 **A. So the first portion I think was just**

1 referring to the fact that it's -- you know, this
2 is a Glock, it's another example of another
3 manufacturer's gun went off in a purse or whatever.
4 And then same thing, when the sheriff's gun goes
5 off in a Walmart store that was also a Glock.

6 So when you look at a lot of these
7 cases I think there seems to be issues where there
8 could have been other things at play as opposed to
9 a gun going off by itself.

10 (Taylor Exhibit 11 was marked for
11 identification.)

12 BY MR. WILLIAMS:

13 Q. I am going to hand you what has been
14 marked as Exhibit 11. This is Sig Glasscock
15 000104.

16 MS. GULLIVER: After this document can
17 we take a short break and then we can do the --

18 MR. WILLIAMS: Sure.

19 MS. GULLIVER: Another big --

20 MR. WILLIAMS: Yeah. Yeah, I
21 literally -- I think there are probably eight more,
22 and then we're done.

23 A. Okay.

24 BY MR. WILLIAMS:

25 Q. This is an e-mail from Douglas Amato to

1 you, correct?

2 **A. Yes.**

3 Q. Who is Douglas Amato?

4 **A. He's a quality engineer in the company.**

5 Q. And he's a Sig Sauer employee?

6 **A. Yes.**

7 Q. I should have just asked it that way.

8 Sometimes we are too technical in our own brains.

9 And who is Ed Murphy?

10 **A. Ed Murphy is our vice president,**
11 **quality control.**

12 Q. He says that, Talked with Ed Murphy
13 this morning, he mentioned you are involved in
14 getting the word out about the P320 can't fire
15 without the trigger being pulled.

16 Did I read that accurately?

17 **A. Yes.**

18 Q. Next sentence. I have noticed some
19 common threads with the P320 firing on their own
20 incidents.

21 Did I read that accurately?

22 **A. Yeah, just a note though that firing on**
23 **its own is in quotes, so --**

24 Q. Oh, yeah.

25 **A. Just...**

1 Q. The next sentence is the one I'm
2 interested in. The ones I read about that had
3 details or a good photo, these all were using the
4 Blackhawk SERPA holster.

5 A. Yes.

6 Q. What was -- do you know what issue
7 there could have been with the Blackhawk SERPA
8 holster that was causing the P320 to discharge?

9 A. That's what I was saying previously
10 with the Hilton, that these SERPA holsters, and in
11 particular it's typically referring to law
12 enforcement holsters that have a light.

13 Q. I'm sorry, that have a what?

14 A. A flashlight on the gun.

15 Q. Oh, flashlight. Thank you.

16 A. So it's wide, so to put the gun in the
17 holster, it has to have a wider opening at the top
18 of the holster which creates a gap. And the
19 Blackhawk SERPA holsters were known for having an
20 extraordinarily wide gap.

21 So when it's in its holster while the
22 trigger guard is covered, it's certainly open at
23 the top so that fingers or other objects are known
24 to be able to slide down into that opening and have
25 access to the trigger.

1 Q. So the Blackhawk SERPA holster in this
2 exhibit is the same as the SERPA holster here,
3 that's just not -- is the -- let me try it this
4 way.

5 You talked to me about the SERPA
6 holster and the female officer, correct?

7 A. Yes.

8 Q. And this one is called a Blackhawk
9 SERPA holster. Are those two different designs of
10 the SERPA holster, or is it the same thing?

11 A. Blackhawk is the manufacturer. It'd be
12 like saying Sig Sauer P320. So it's a Blackhawk
13 SERPA.

14 Q. Okay, thank you. I was like, well, are
15 they different? That makes sense.

16 We're going to take a short break, and
17 then hopefully I'm going to get you out of here
18 within the next hour.

19 A. Okay.

20 THE VIDEOGRAPHER: Off the record,
21 11:01.

22 (Recess taken.)

23 THE VIDEOGRAPHER: We're back on the
24 record 11:11, Media No. 4. Please proceed.

25 BY MR. WILLIAMS:

1 Q. You understand that you're still under
2 oath, correct?

3 A. I do.

4 (Taylor Exhibit 12 was marked for identification.)

5 BY MR. WILLIAMS:

6 Q. I am going to hand you what has been
7 marked as Exhibit 12, and that is document Sig
8 000224 through -- 24 through 26.

9 A. Okay.

10 Q. If you go to the second page, which is
11 Sig Glasscock 00025, it's an e-mail from Harris
12 Elhan, E-L-H-A-N, from Blackstone West to Samantha
13 Piatt, correct?

14 A. Yes.

15 Q. And it's from January 11th of 2023,
16 correct?

17 A. Yes.

18 Q. And it's about the Sig 320, is the
19 subject?

20 A. Yes.

21 Q. In that e-mail that was forwarded to
22 Ms. Piatt is another e-mail that is just on the --
23 from Evan's Gun World company page to Harris Elhan,
24 correct?

25 A. Yes.

1 Q. And is Blackstone Market -- Marketing,
2 is that one of the companies that Sig uses for
3 marketing?

4 A. No, it's actually a sales rep
5 organization. Harris Elhan was a sales rep for
6 Sig, so a sales rep organization is what Blackstone
7 Marketing is.

8 Q. Okay. Tell me what you mean when you
9 say sales rep organization.

10 A. They call on our customers.

11 Q. So do you have an individual contract
12 with Harris Elhan, or is there a contract with
13 Blackstone Marketing?

14 A. Blackstone.

15 Q. Okay. And he's just one of the
16 employees?

17 A. Yes.

18 Q. Okay. And in this e-mail Evan's Gun
19 World, the last sentence of the second paragraph
20 says, After consulting with our attorney, we have
21 decided to shelve all Sig 320 and not sell or
22 transfer until we get clarification from Sig. Do
23 you see that?

24 A. I do.

25 Q. And then if we go to the first page,

1 Samantha Piatt is sending to you and Jack Barnes
2 some draft language, correct?

3 **A. Yes.**

4 Q. And that was on Thursday, January 12th
5 of 2023 at 12:38 a.m. correct?

6 **A. Yes.**

7 Q. In her second sentence it says, Tom,
8 this is all language from the plug-and-play
9 document. Do you see that?

10 **A. I do.**

11 Q. I also included the video that we just
12 posted. Correct?

13 **A. Yes.**

14 Q. What is the plug-and-play document?

15 **A. I believe what she's referring to there
16 would be a document that we had already approved
17 internally for use, making a statement about the
18 P320.**

19 Q. Did you have plug and play documents
20 for other guns?

21 **A. It would totally depend on the
22 circumstances.**

23 Q. Can you think of any other firearm
24 other than the P320 that you had a plug-and-play
25 document for?

1 MS. GULLIVER: Objection to form.
2 Objection beyond the scope. You can answer in your
3 personal capacity.

4 A. Yeah, if there was -- were any issues
5 with a gun, we would have collaborate --
6 collaboratively written a document and all approved
7 it to use it, you know, to say, Okay, it's -- if we
8 get an inquiry from a media outlet or a customer
9 such as this, it would be a document we can send it
10 out.

11 So, for example, if the Cross rifle had
12 a recall at one time, we had a document we could
13 send out to explain what that recall was about,
14 that sort of thing. So there were other guns that
15 had documents that would have been approved in that
16 capacity.

17 BY MR. WILLIAMS:

18 Q. So your example of a plug-and-play
19 document would be one for the Cross rifle?

20 A. I'm not -- I'm just saying it's just a
21 generalization. Plug and play, she could have said
22 form letter, she could have said a lot of things.
23 I think she's just -- there was no formal term plug
24 and play, I think she was just referring to an
25 approved document.

1 Q. Right. And I guess my question was can
2 you think of any other gun other than the P320 that
3 you've had a form letter or a plug-and-play
4 document for?

5 MS. GULLIVER: Objection, beyond the
6 scope. You can answer in your personal capacity.

7 A. As I made the example of, we would have
8 had a statement for an issue we had with our Cross
9 rifle, that we would have had a document which we'd
10 have sent out in the same fashion. So the answer
11 to your question is yes.

12 BY MR. WILLIAMS:

13 Q. Okay. So, yes, the Cross one had a
14 plug and play or standardized letter?

15 A. Yes.

16 (Taylor Exhibit 13 was marked for
17 identification.)

18 BY MR. WILLIAMS:

19 Q. I'm handing you what has been marked as
20 deposition Exhibit 13.

21 A. Okay.

22 Q. This is a document dated March 24th of
23 2023, correct?

24 A. Yes.

25 Q. And it is addressed to Champe Barton

1 and Tom Jackson, correct?

2 **A. Jackman, yes.**

3 Q. I'm sorry, Jackman. And there it says,
4 The Washington Post/Trace -- The Trace?

5 **A. Yes.**

6 Q. Is The Trace a part of the Washington
7 Post?

8 **A. Yes, it's a subsidiary company of the**
9 **Washington Post.**

10 Q. Okay. Well, I just wondered because
11 they were at the same address.

12 **A. Yes.**

13 Q. And this says this is the Sig response
14 to an inquiry re the P320, correct?

15 **A. Yes.**

16 Q. And earlier we talked about a story
17 that ABC was investigating, correct?

18 **A. Yes.**

19 Q. Was this separate and apart from the
20 ABC --

21 **A. Yes.**

22 Q. -- story?

23 **A. Yes.**

24 MR. WILLIAMS: And then the page
25 numbers for that document were 255 and 256.

1 (Taylor Exhibit 14 was marked for
2 identification.)

3 BY MR. WILLIAMS:

4 Q. I'm handing you what has been marked as
5 Exhibit 14. Exhibit 14 are documents numbered 257
6 through 259.

7 A. Okay.

8 Q. Okay. On Exhibit 14 the very last
9 page, which is Bates labeled 259, Ms. Piatt is
10 forwarding the Sig Sauer reply that we -- that was
11 marked as Exhibit 13. Do you see that?

12 MS. GULLIVER: Objection, form.

13 A. So the only thing I don't know is that
14 letter that was sent to them also had -- I think
15 there were other documents that were sent that I
16 didn't see in your attachment, but that's the only
17 thing I would just clarify.

18 BY MR. WILLIAMS:

19 Q. I'm sorry?

20 A. That's not -- that was not the only
21 thing sent to the Washington Post and The Trace, we
22 sent them a lot of documentation about 320 cases,
23 so they had a pretty significant set of documents
24 supporting our information about the P320. So I'm
25 just saying in this context I don't know if it's

1 referring to that letter or another communication
2 that we had sent to them with information. So
3 that's my only -- I just want to be clear that I
4 can't assume which one it's referring to.

5 Q. Okay. If you look at Exhibit 13, the
6 Re line of that is Sig Sauer response to inquiry re
7 P320, correct?

8 A. Yes.

9 Q. And if you look at that document,
10 there's nothing that shows that there was an
11 attachment to it, correct?

12 A. This?

13 Q. No. On Exhibit 13, sorry.

14 A. This would probably -- this would have
15 been an attachment to an e-mail, I assume. I'm not
16 sure I understand your question.

17 Q. Right. There's nothing on 13 that
18 shows that there were any other documents attached?

19 A. True. Yes, true. True statement.

20 Q. And then when you look at the e-mail of
21 March 30th -- sorry, get back to that page -- of
22 March 24th of 2023, do you see that?

23 A. Yes.

24 Q. Mrs. Piatt's e-mail to -- it's an
25 e-mail from Ms. Piatt to Mr. Jackman and

1 Mr. Barton, correct?

2 A. Yes.

3 Q. And it says, Mr. Jackman plus Barton,
4 See attached reply to your inquiry. Please kindly
5 confirm receipt of our reply. Correct?

6 A. Yes.

7 Q. And then you get, on March 27th of
8 2023, which is on page 258, a reply from Tom
9 Jackman to her e-mail, correct?

10 A. Yes.

11 Q. And then on the 28th Ms. Piatt responds
12 to Mr. Jackman and Mr. Barton asking for, hey,
13 what's the deadline, correct?

14 A. Yes.

15 Q. And then on the first page, which is
16 what I'm interested in, there's an e-mail from
17 Barton Champe, C-H-A-M-P-E, on Thursday, March 30th
18 of 2023 to Tom Jackman and Samantha Piatt, correct?

19 A. Yes.

20 Q. And in the body of it it says, Hi,
21 Ms. Piatt, following up with two additional notes.
22 And the last sentence has a quote, or the
23 next-to-the-last sentence, starts with, He said,
24 regarding -- or actually, I'll just read the whole
25 thing.

1 The next it says, In the past week we
2 spoke with Bill Lewinski, an expert in accidental
3 shootings and executive director of the Force
4 Science Institute. He said regarding the reports
5 of injuries with P320, The number and frequency of
6 injuries are strongly suggestive of a design flaw
7 versus a human performance error. What we're
8 seeing is highly unusual.

9 And it's, quote -- I guess it's in
10 quotation marks from before the word the, and after
11 the word unusual. Do you see that?

12 **A. Yes.**

13 Q. Did you ever have any communications
14 with Mr. Lewinski?

15 **A. No.**

16 Q. Do you know who Mr. Lewinski is?

17 **A. No. Other than what it says in the**
18 **document here, executive director of the Force**
19 **Science Institute.**

20 Q. Hum?

21 **A. I don't know who he is other than what**
22 **it says who he is here, that's all I'm saying.**

23 Q. Oh. I was -- I'm like, what did I
24 miss? Okay, you mean -- and just to be clear, you
25 mean that in the document or in this e-mail

1 Mr. Lewinski's title is listed as expert in
2 accidental shootings and executive director of
3 Force Science Institute, correct?

4 MS. GULLIVER: Objection to form.

5 A. Yes.

6 BY MR. WILLIAMS:

7 Q. You haven't had any -- or maybe you
8 have. Had any communications with the Force
9 Science Institute?

10 A. No.

11 Q. So you weren't saying that you've --

12 A. No, I was just saying --

13 Q. -- dealt with him?

14 A. You said I didn't know what he did or
15 something, and I said, I can only know what he did
16 by what it says in this e-mail.

17 Q. Got you. I heard something else.

18 A. Sorry.

19 Q. Because I was thinking of my next
20 question or moving on, and you said something about
21 the Force Science Institute, I'm like, wait, you've
22 been there? Okay, let's talk about it. So I
23 apologize, you probably said that and I just didn't
24 hear.

25 Do you know what the Force Science

1 Institute is?

2 **A. I don't.**

3 (Taylor Exhibit 15 was marked for
4 identification.)

5 BY MR. WILLIAMS:

6 Q. Keep that out, because here is
7 Exhibit 15.

8 MR. WILLIAMS: And for the record, this
9 is Sig 250 through 254.

10 BY MR. WILLIAMS:

11 Q. And so if you look at Exhibit 14, when
12 Ms. Piatt responds on 3/30 at 4:46 she says,
13 Please -- please see attached for the response to
14 your follow-up. Please confirm receipt. Do you
15 see that?

16 **A. I do.**

17 Q. And the reason I'm doing it in this
18 record is because that's the way they were
19 produced. As you'll see, the numbers are
20 sequentially -- they were produced in sequential
21 order, but this 250 is dated March -- or
22 Exhibit 15 --

23 **A. Yes.**

24 Q. -- is dated March 30 of 2023, correct?

25 **A. Yes.**

1 Q. And it says it's the Sig Sauer Further
2 Response to Inquiry?

3 A. Yes.

4 Q. And if you just flip through that, does
5 this contain the additional information you were
6 talking about earlier, or that you mentioned
7 earlier you thought was in your response?

8 A. Yes, I believe this is the additional
9 information I was referring to.

10 Q. Okay. Now, this document addresses
11 certain questions that were raised in the e-mail by
12 either Mr. -- either Mr. Barton or Mr. Jackman,
13 correct?

14 A. Yes.

15 Q. Do you know if this document or
16 information was shared with anyone other than in
17 response to the request of Mr. Barton and
18 Mr. Jackman?

19 A. No.

20 Q. And were you involved in drafting of
21 this document?

22 A. Yes.

23 (Discussion off the record.)

24 (Taylor Exhibit 16 was marked for
25 identification.)

1 BY MR. WILLIAMS:

2 Q. I'm handing you what has been marked as
3 Exhibit 16.

4 A. Are we moving on from these?

5 Q. Yeah.

6 A. Okay.

7 Q. I will say if there's more you want to
8 talk about, let's do it.

9 A. No. All good.

10 Q. Okay. Let me know when you've had a
11 chance to review Exhibit 16.

12 A. Okay.

13 Q. Now, this is from you to Ron Cohen,
14 correct?

15 A. Yes.

16 Q. Dated April 13 of 2023, correct?

17 A. Yes.

18 Q. Who is Ron Cohen?

19 A. CEO at Sig Sauer.

20 Q. And the subject states, DRAFT
21 Statement/Docs. Correct?

22 A. Yes.

23 Q. First sentence says, Forgot to mention
24 that Sig and the P320 was part of Stephen Colbert's
25 opening monologue last night on national TV.

1 Correct?

2 **A. Yes.**

3 Q. I know that he is an antigun idiot, but
4 this is hitting about as hard as anything we've
5 seen.

6 Did I read that accurately?

7 **A. Yes.**

8 Q. This is all vetted by Shawver,
9 S-H-A-W-V-E-R --

10 **A. Yes.**

11 Q. -- Rob, and all three main Clark-Hill
12 guys, (Nick, Howard and Joe).

13 Did I read that accurately?

14 **A. Yes.**

15 Q. And then it has, Here's our statement
16 without documents. And here's a statement to use
17 with documents attached. Correct?

18 **A. Yes.**

19 Q. What makes Stephen Colbert an antigun
20 idiot?

21 **A. Well, I think he's pretty widely**
22 **documented as antigun, I think that's just part of**
23 **his position, and the idiot piece is just my**
24 **personal, you know, slam to him, I guess.**

25 I'm just not a fan at all of any of his

1 humor, so it's -- introduced that term. So I don't
2 think the antigun and idiot are necessarily meant
3 to go together. That's more of my interpretation
4 of Stephen Colbert.

5 Q. Because someone takes an antigun stance
6 doesn't make them an idiot, correct?

7 A. Absolutely not.

8 Q. There can be intelligent people that
9 aren't -- that are antigun, and are unintelligent
10 people that are antigun, correct?

11 A. 100 percent.

12 Q. Just like there can be pro-gun people
13 that are intelligent and there can be pro-gun
14 people that are idiots?

15 A. Very much so.

16 (Taylor Exhibit 17 was marked for
17 identification.)

18 BY MR. WILLIAMS:

19 Q. You have been handed what is
20 Exhibit 17, which is documents 218 and 219 from the
21 Sig Glasscock production.

22 A. Okay.

23 Q. This is an e-mail from Samantha Piatt
24 on April 13th of 2023 to Steve Rose, correct?

25 A. Yes.

1 Q. And I believe you were also a
2 recipient. Who is Steve Rose?

3 A. He is executive vice president of our
4 defense sales team.

5 Q. And in the e-mail it says that, Below
6 are the items that you requested to handle the
7 inquiries coming into your team from the field
8 relative to the Washington Post/Trace article.

9 Please do not release this to your team
10 until Tom has given the all clear, just a final set
11 of eyes to check my work. If there's something I
12 missed in your request, let me know.

13 Did I read that accurately?

14 A. Yes.

15 Q. Was Sig getting a lot of requests for
16 information related to the Washington Post and The
17 Trace article?

18 A. I wouldn't -- I don't know if I'd
19 classify it as a lot, but we did get inquiries.

20 Q. And were those specifically coming from
21 the government side?

22 MS. GULLIVER: Objection, beyond the
23 scope. You can answer in your personal capacity.

24 A. No, they were coming from other --
25 all -- a number of sources.

1 BY MR. WILLIAMS:

2 Q. Well, you said Mr. Rose is on the
3 government side, correct?

4 A. **Yeah, yes.**

5 Q. And was he asking for this letter as
6 part of -- we talked about how sometimes you put
7 out your position to combat what you believe is
8 misinformation, correct?

9 A. **Yes.**

10 Q. And that information comes from the
11 marketing department, correct?

12 A. **Yes.**

13 Q. And --

14 A. **Among others.**

15 Q. What others?

16 A. **Marketing department, legal department,
17 approved by our CEO and so forth. So there's
18 others involved in -- besides just marketing.**

19 Q. Okay. And Mr. Rose reached out to
20 Ms. Piatt in her official capacity, correct?

21 A. **Yes.**

22 Q. And what is her official capacity?

23 A. **Director of communications.**

24 Q. And you approved this communication,
25 correct?

1 A. At this time I don't know if it was
2 finally approved because it says it was waiting for
3 my approval. So I can't recall exactly if it
4 was -- if it was approved like this or if there
5 were any changes to it. So, as she said, it was
6 awaiting my approval, so...

7 (Taylor Exhibit 18 was marked for
8 identification.)

9 BY MR. WILLIAMS:

10 Q. You have been handed what is marked as
11 Document -- Exhibit 18, correct?

12 A. Yes.

13 Q. And it is Sig Glasscock Exhibit 4 --
14 I'm sorry, Sig Glasscock 0000004. Correct?

15 A. I can't see that, but --

16 MS. GULLIVER: Yeah, it's not --

17 MR. WILLIAMS: Oh.

18 BY MR. WILLIAMS:

19 Q. Okay. I will represent that the
20 document is 000 -- a lot of 0s and a 4.

21 A. Yes.

22 Q. And this is -- at least it appears to
23 be an e-mail from Samantha Piatt to Steve Young, is
24 that correct?

25 A. Yes.

1 Q. Who is Steve Young?

2 A. He's a sales rep.

3 Q. And it also CCs Jack Barnes and
4 yourself, correct?

5 A. Yes.

6 Q. And in it she says, Steve, per our
7 conversation, the following text is approved for
8 you to send along with the attachments. Correct?

9 A. Yes.

10 Q. And this appears to be the statement
11 that we talked about in the last exhibit?

12 A. Without comparing it side by side, I
13 can't say for certain.

14 Q. And I will --

15 A. It is -- it is a bit different.

16 Q. Yeah. I will agree with you that if
17 you look at the documents where it says on
18 Exhibit -- there are certain -- while the main
19 paragraphs are different, the headings are
20 different and then there is something added above
21 the -- or below the, We invite, there's another
22 sentence added to that paragraph and then another
23 sentence, but in essence they're pretty similar?

24 MS. GULLIVER: Objection to form.

25 BY MR. WILLIAMS:

1 Q. Can we go with similar?

2 MS. GULLIVER: Objection to form.

3 A. They're similar, but that's why I
4 questioned it before because they are -- you know,
5 when I said I don't know whether this one was
6 approved, because they are -- there are differences
7 in them, but yeah. So they're similar documents.

8 BY MR. WILLIAMS:

9 Q. Yeah. And that's what's called a
10 lawyer being lazy because I looked at it and said,
11 Oh, yeah, he approved it.

12 So similar statements, but not exactly?

13 A. Yes.

14 MR. WILLIAMS: What was that last
15 number?

16 MS. GULLIVER: 18. Now it should be
17 19.

18 MR. WILLIAMS: We should be done in
19 about three exhibits or so.

20 (Taylor Exhibit 19 was marked for
21 identification.)

22 BY MR. WILLIAMS:

23 Q. I'm handing you what has been marked as
24 Exhibit 19. And on my version is documents Sig
25 Glasscock 12, 13, 14, and then an attachment that

1 doesn't have the Bates numbers on it. But I
2 believe that attachment is one we've already
3 discussed.

4 **A. Okay.**

5 Q. Now, does this appear to be an e-mail
6 that's being sent to forward a customer concern
7 from Bass Pro?

8 **A. Yes.**

9 Q. And then on the first page Jack Barnes
10 on April 17 forwards it to you and some others and
11 says, I would think that Bass should direct
12 customers to Sig customer service so they can use
13 the talking points and possible -- and possibly
14 talk them out of the return. Correct?

15 MS. GULLIVER: Objection to form.

16 **A. Yes.**

17 BY MR. WILLIAMS:

18 Q. And then Chris Meyer responds on 4/17
19 at 11:27 a.m., correct?

20 **A. Yes.**

21 Q. And he says, This being said, our
22 current verbiage doesn't directly attack the WaPo
23 points. Can I have the green light to use the full
24 statement that we sent WaPo in official capacity
25 attached? Correct?

1 **A. Yes.**

2 Q. And then the last two pages are the
3 response to the Washington Post article, correct?

4 **A. Yes.**

5 Q. Did you -- did Sig give permission and
6 send this response out?

7 **A. I don't recall.**

8 Q. Who would have been the person at Sig
9 that would have had to authorize that?

10 **A. I think I would have been able to**
11 **authorize it, I just don't remember if I did.**

12 (Taylor Exhibit 20 was marked for
13 identification.)

14 MS. GULLIVER: Does this one have a
15 Bates range?

16 MR. WILLIAMS: I don't see one.

17 MS. GULLIVER: Okay. It looks like
18 it's cut off, so maybe we could add this to your
19 list.

20 MR. WILLIAMS: Yeah. Yeah. This is a
21 Todd. Somehow if he copied it, it didn't get a
22 Bates number.

23 **A. Okay.**

24 BY MR. WILLIAMS:

25 Q. Have you had a chance to look at

1 Exhibit 20?

2 A. Yes.

3 Q. It's an e-mail, appears to be, from QA
4 Outdoors. What is QA Outdoors?

5 A. It's part of a daily news outlet in the
6 outdoor industry. This is a weekly interview they
7 do and send an e-mail out with the interview.

8 Q. And so did you sit for this interview
9 or did they just send you questions and you send
10 them back in?

11 A. I believe it was a verbal interview
12 of -- phone. Phone interview.

13 Q. And who is Jim Shepherd?

14 A. He's the publisher and editor of -- the
15 Outdoor Wire is the public -- the main publication,
16 and QA Outdoors is part of that.

17 Q. And does Sig -- I'm sorry, what was his
18 name, this publication? Or what --

19 A. The Outdoor Wire.

20 Q. Does Sig advertise or do any business
21 with the Outdoor Wire or their parent company?

22 A. Yes.

23 Q. And what type of business does Sig do
24 with the Outdoor Wire?

25 A. Just run an ad.

1 Q. Anything else?

2 A. No.

3 (Taylor Exhibit 21 was marked for
4 identification.)

5 BY MR. WILLIAMS:

6 Q. I'm going to hand you what has been
7 marked as Exhibit 21.

8 MS. GULLIVER: And just so we have it
9 for Kristen, it looks like the Bates number is P320
10 design 40, is that right?

11 MR. WILLIAMS: Yes.

12 MS. DENNISON: P320 design, what, 40?

13 MS. GULLIVER: 40.

14 MS. DENNISON: Okay, thank you.

15 MS. GULLIVER: Uh-hum.

16 MS. DENNISON: I know which one that
17 is.

18 A. Okay.

19 BY MR. WILLIAMS:

20 Q. Who is Sean Toner?

21 A. He's an engineer for Sig.

22 Q. And this is an e-mail that was sent to
23 Amanda Hasevlat --

24 A. Hasevlat.

25 Q. Hasevlat, H-A-S-E-V-L-A-T, and Craig

1 Soboleski, S-O-B-O-L-E-S-K-I and Matthew Taylor,
2 with a CC to Chris Slusarz, S-L-U-S-A-R-Z, and
3 David Johnson. Correct?

4 **A. Yes.**

5 Q. And the re is P250 & 320 technical
6 specification confirmation. Do you see that?

7 **A. Yes.**

8 Q. In the body it says, Measured the
9 weights today, so I am confident they are correct.
10 Slight radius was also measured on gun. Correct?

11 MS. GULLIVER: Objection to form.

12 **A. Sight. Sight radius.**

13 BY MR. WILLIAMS:

14 Q. Sight radius was also measured on the
15 gun.

16 **A. Yeah.**

17 Q. Correct?

18 **A. Yes.**

19 Q. And the next sentence says, As far as
20 trigger pull, we have never made one with a 5.5
21 trigger pull weight, but that is a marketing call.
22 Correct?

23 **A. Yes.**

24 Q. Do you know why marketing was involved
25 in the weight of a trigger pull?

1 MS. GULLIVER: Objection. Beyond the
2 scope, you can answer in your personal capacity.

3 A. No, this was before I was even
4 employed, so I wouldn't know why that -- why that
5 is in there.

6 BY MR. WILLIAMS:

7 Q. In your tenure at Sig Sauer, have you
8 ever been involved in deciding the weight of a
9 trigger pull?

10 A. No.

11 Q. Are you aware of anyone else in
12 marketing who's been involved in deciding the
13 weight of a trigger pull?

14 A. No.

15 (Taylor Exhibit 22 was marked for
16 identification.)

17 BY MR. WILLIAMS:

18 Q. I'm going to hand you what has been
19 marked as Exhibit 22. This is Bates numbered 200
20 through 217. So Sig Glasscock 200 -- I'm sorry.
21 Sig Glasscock 201 through 207.

22 A. Okay.

23 Q. If you flip to page 210 at the bottom.

24 A. Okay.

25 Q. Actually, I think you have to go to 209

1 to get the start of it.

2 **A. Okay.**

3 Q. Do you see that bottom e-mail starts
4 with, it's an e-mail from Jose Pagliery,
5 P-A-G-L-I-E-R-Y?

6 **A. Yes.**

7 Q. And it is to Joel Harris at Sig Sauer?

8 **A. Yes.**

9 Q. Who is Joel Harris?

10 **A. At that time he was the director of**
11 **communications.**

12 Q. And what did the director of
13 communications do?

14 **A. Media relations, writing press**
15 **releases, that sort of thing.**

16 Q. All right. And that's dated Tuesday,
17 April 17th, 2018 at 2:39 p.m., correct?

18 **A. Yes.**

19 Q. And it starts off, Joel, Jose at CNN
20 here. I have been working on a piece that takes a
21 look at the Sig P320 and the voluntary upgrade
22 program. We have reached the point in our
23 reporting where it is crucial to hear from
24 Sig Sauer itself.

25 Did I read that accurately?

1 **A. Yes.**

2 Q. Our story, which will run in the coming
3 days, will explain to the American public the drop
4 fire issues and -- that led to the voluntary
5 upgrade program and incidents related to accidental
6 discharges.

7 Did I read that accurately?

8 **A. Yes.**

9 Q. The next paragraph says, Certain
10 aspects of this story are pivotal. How many
11 non-upgraded P320s are out there in customers'
12 hands? Are they sitting on store shelves? Are
13 only upgraded P320s on sale right now? Only
14 Sig Sauer is in a position to answer these
15 questions and address the public's concerns.

16 Did I read that accurately?

17 **A. Yes.**

18 Q. Next paragraph. Parts of this matter
19 are complex. We prefer to speak to Sig Sauer
20 instead of relying on e-mail to ensure a
21 free-flowing conversation. But we are including
22 our questions so you may prepare for them.

23 We would like to sit down with CEO Ron
24 Cohen for an on-camera interview. As that would
25 best convey how serious -- how seriously the

1 company is taking this matter.

2 And if you have any questions of us,
3 please let us know. Correct?

4 **A. Yes.**

5 Q. And then the following pages are
6 questions that he has posed, correct?

7 **A. Yes.**

8 Q. And if you go to page 208.

9 **A. Okay.**

10 Q. There's an e-mail from Jose Pagliery to
11 Joel Harris, correct?

12 **A. Yes.**

13 Q. And that's on Wednesday the 18th, 2018
14 at 8:21 a.m. correct?

15 **A. Yes.**

16 Q. And it says, Joel, it's extremely
17 important to us that we hear from Sig Sauer on
18 this. Can you please let us know if you're open to
19 answering our questions? Your input is pivotal for
20 this story to address the concerns of your
21 customers and the American public at large.

22 Did I read that accurately?

23 **A. Yes.**

24 Q. Page 207.

25 **A. Okay.**

1 Q. Okay, at the bottom on April 18th, 2018
2 at 10:01 Joel Harris wrote, Jose, we are reviewing
3 your questions. What is your timeline? Best
4 regards, Joel Harris, Director Media Relations &
5 Communication.

6 Did I read that accurately?

7 A. Yes.

8 Q. The next e-mail is a response from Jose
9 Pagliery to Joel Harris, correct?

10 A. Yes.

11 Q. And that is on April 18th at 10:35 a.m.

12 A. Yes.

13 Q. And it says, Thank you, this will be
14 e-mail/phone only. Our deadline is end of day
15 Thursday. If Mr. Cohen is willing to sit down for
16 an on-camera interview, we can push this to Friday.

17 Did I read that accurately?

18 A. Yes.

19 Q. Then if we go up -- actually, we have
20 to go to 206 to get the time. So page 206 Joel
21 Harris responds to Jose on Wednesday April 18th at
22 1:00 p.m., correct?

23 A. Yes.

24 Q. And he says, Jose, Mr. Cohen is away on
25 personal vacation, I'm trying to reach him. I'll

1 get back to you. Thank you.

2 Did I read that accurately?

3 **A. Yes.**

4 Q. On 205 Jose reaches back out to Joel
5 Harris, correct, at 1:08 p.m.?

6 **A. Yes.**

7 Q. And says, If he is open to the sit-down
8 interview, I may have success in pushing this back
9 further than Friday. Correct?

10 **A. Yes. Yes, yes.**

11 Q. And then the next day on Thursday,
12 April 19th, 2018 at 10:18 a.m. Joel responds to
13 Jose, correct?

14 **A. Yes.**

15 Q. And he says, Jose, I'm still waiting
16 for confirmation from our CEO on his availability.
17 Best regards, Joel. Correct?

18 **A. Yup.**

19 Q. On page 204 we see that Joel responds
20 on April 19, 2018 at 10:23 a.m. correct?

21 **A. Uh-hum, yes.**

22 Q. And just says, Thank You?

23 **A. Yes.**

24 Q. Page 203.

25 **A. Okay.**

1 Q. Joel responds to Jose on Friday the
2 20th, correct?

3 A. Yes.

4 Q. And it says, Jose, I was finally able
5 to get in contact with Mr. Cohen, but he is
6 unavailable to do an interview. Correct?

7 A. Yes.

8 Q. And then on that same page Jose
9 responds at 10:09 on April 20th and says, Okay,
10 thanks for trying. When can we expect a response
11 from Sig to our questions? Correct?

12 A. Yes.

13 Q. And that e-mail is at 10:09 on
14 April 20th, correct?

15 A. Yes.

16 Q. And approximately 24 minutes later Joel
17 sends the e-mail to you, Tabitha Wade and Teddy
18 Novin, correct?

19 A. Yes.

20 Q. Who is Tabitha Wade?

21 A. She is Ron Cohen's chief of staff.

22 Q. Who is Teddy Novin, N-O-V-I-N?

23 A. He was an outside communications
24 consultant.

25 Q. And is he someone that Sig Sauer used

1 for communications?

2 **A. We work with him, yes.**

3 Q. It simply says, FYI. See below.

4 Correct?

5 **A. Yes.**

6 Q. Now, if we go to the first page there's
7 an e-mail from you on the 20th at 4:41 p.m.,
8 correct?

9 **A. Yes.**

10 Q. In that e-mail it starts with, Hi,
11 Debi. Who's Debi?

12 **A. Debi Dawson is the communications**
13 **manager for US Army PEO Soldier.**

14 Q. And what is PEO Soldier?

15 **A. It's their acquisition department.**

16 Q. That's not a magazine or something?

17 **A. No.**

18 Q. Okay. It says, Hi, Debi. Per our
19 communication, here is the entire e-mail traffic
20 with the CNN reporter including the questions he
21 had for Sig in the original e-mail at the bottom.

22 Did I read that correctly?

23 **A. Yes.**

24 Q. We traded e-mails with him about
25 whether our CEO, Ron Cohen, would do a live

1 interview, but never intended to do that.

2 Did I read that accurately?

3 **A. Yes.**

4 Q. We had hoped to navigate the release of
5 this story to today, Friday.

6 Did I read that accurately?

7 **A. Yes.**

8 Q. We also never intended to answer his
9 questions.

10 Did I read that accurately?

11 **A. Yes.**

12 Q. We went dark to him as of -- it says,
13 his 10:09 a.m. e-mail this morning.

14 Did I read this accurately?

15 **A. Yes.**

16 Q. From our point of view this is a smear
17 tactic story and will have many non-connected
18 elements trying to paint a very negative picture
19 about the P320, and possibly the Army's selection
20 of the M17.

21 Did I read that accurately?

22 **A. Yes.**

23 Q. But I suppose we do not know that for
24 sure. Please see below.

25 Did I read that accurately?

1 A. Yes.

2 Q. I will keep you updated if I hear
3 anything else. Correct?

4 A. Yes.

5 Q. Which of his questions that are
6 attached to this e-mail did you think were part of
7 a smear campaign?

8 A. I'd have to study them for a while to
9 tell you exactly which ones I thought and go back,
10 recollection, you know, from six years ago. I
11 think wholistically, when you read a list of
12 questions like this, we're able to usually put
13 together sort of what we think the media outlet is
14 looking for.

15 And our opinion was that this was an
16 old story, it was a year old after a voluntary
17 upgrade at this point. He was mixing a lot of
18 issues and questions, and we just felt like he was
19 sort of on a fishing expedition for we didn't know
20 exactly what, and so we just didn't trust that this
21 was going to be an honest story.

22 Q. Did you read the questions before
23 making that determination?

24 A. Of course we would have read them, yes.

25 Q. And you said that, We traded e-mails

1 with him about whether our CEO, Ron Cohen, would do
2 a live interview, but never intended to do that.
3 Correct?

4 **A. Yes.**

5 Q. Why not just tell him, Our CEO is
6 unavailable, or, we're not going to do the
7 interview?

8 MS. GULLIVER: Objection, form.

9 **A. I'm not sure why -- to be honest with**
10 **you why we delayed in telling him that. We may**
11 **have been in discussions with our CEO at the time**
12 **about whether he was going to do it or not. He**
13 **does not do a lot of live interviews, and so we**
14 **could have been discussing it internally.**

15 To say we never intended to do it, you
16 know, I don't know if it's wholly true in the early
17 moments of these -- this e-mail coming in. But,
18 you know, at some point we made a determination to
19 not have him do that.

20 BY MR. WILLIAMS:

21 Q. It also says, We never intended to
22 answer his questions. So why not just tell him no?

23 MS. GULLIVER: Objection to form.

24 **A. Yeah, I think we eventually did tell**
25 **him no, that we weren't -- we weren't going to**

1 **answer the questions.**

2 BY MR. WILLIAMS:

3 Q. You believe you told him no after this
4 e-mail string?

5 A. I'll have to go, maybe go back and read
6 it again to see whether we actually said no or
7 whether we just stopped replying.

8 Q. Well, this says, We went dark.

9 A. Yeah. So then we just stopped
10 replying.

11 Q. And before you said that there, you
12 know, you were upset with ABC News because the
13 story was slanted and didn't give your perspective,
14 do you recall that?

15 A. Yes.

16 Q. Here you were being asked to give your
17 side of the story and you never intended to answer
18 his questions and went dark on him, is that
19 correct?

20 MS. GULLIVER: Objection to form.

21 A. That's what it says.

22 BY MR. WILLIAMS:

23 Q. And then by this time you also had
24 prepared draft answers to questions, do you recall
25 that?

1 MS. GULLIVER: Objection, form.

2 A. Not necessarily related to this time
3 period. This time period was in an odd place
4 because this was about a year after the upgrade,
5 but it was either before or just at the very
6 beginning of the alleged guns going off by
7 themselves.

8 So in reading his questions, our
9 opinion was that he was mixing a bunch of facts or
10 non-facts, and he was looking for a way to spin a
11 story.

12 When you deal with the antigun media,
13 and we're, you know, not extremely trustful of
14 whether they are going to report the facts
15 accurately, which is why we're trepidatious about
16 that sort of thing.

17 BY MR. WILLIAMS:

18 Q. Had you had dealings with this
19 individual before?

20 A. No.

21 Q. And you believed CNN was doing -- is
22 CNN considered antigun media?

23 A. Very much.

24 Q. And what makes somebody antigun media?

25 MS. GULLIVER: Objection, form.

1 **A. We look at it when they, you know,**
2 **issue stories that don't -- that aren't factual.**

3 BY MR. WILLIAMS:

4 Q. Is it that they aren't factual or that
5 you don't agree with them --

6 MS. GULLIVER: Objection form.

7 BY MR. WILLIAMS:

8 Q. -- that makes them antigun. I mean I
9 honestly don't know the answer.

10 **A. It could be both. More often than not,**
11 **it's not factual.**

12 Q. But you would agree that someone can --
13 the media can disagree with your position on
14 something and it doesn't make them antigun or
15 antiSig, right?

16 **A. It could.**

17 Q. Is there any media, ABC, NBC, CBS or
18 Fox that hasn't done a story that was critical of
19 guns?

20 **A. I would say they all probably have at**
21 **times. Even Fox, which is the most conservative of**
22 **the four major networks.**

23 Q. And would you consider Fox to be
24 antigun?

25 **A. They're probably not.**

1 MR. WILLIAMS: I don't think I'm going
2 to ask any of these others. If you want to give me
3 five minutes, I think we're pretty much done.

4 MS. GULLIVER: Great. Let's go off the
5 record.

6 THE VIDEOGRAPHER: Off the record,
7 12:13.

8 (Recess taken.)

9 THE VIDEOGRAPHER: We're going back on
10 the record, 12:25, Media No. 5. Please proceed.

11 BY MR. WILLIAMS:

12 Q. Okay, during the break I found 36 new
13 documents. I'm just kidding.

14 A. Oh, good.

15 Q. Have you been able to listen to my
16 question -- or, I'm sorry. Have you been able to
17 hear my questions and understand them?

18 A. Yes.

19 Q. Have you answered my questions in a
20 truthful and honest way?

21 A. Yes.

22 MR. WILLIAMS: I have no further
23 questions.

24 THE WITNESS: Thank you.

25 MS. GULLIVER: Let's just go off the

1 record for a minute.

2 THE VIDEOGRAPHER: Off the record at
3 12:26.

4 (Recess taken.)

5 THE VIDEOGRAPHER: We're going back on
6 the record, 12:35, Media No. 6. Please proceed.

7 EXAMINATION

8 BY MS. GULLIVER:

9 Q. Mr. Taylor, do you remember earlier
10 today you testified regarding your preparation for
11 today's deposition?

12 A. I do.

13 Q. And do you recall being asked whether
14 you reviewed any documents to prepare for the
15 deposition today?

16 A. I do.

17 Q. And did you also review e-mails as part
18 of your deposition preparation?

19 A. I did.

20 Q. Okay. And what type of e-mails?

21 A. Various types, many of which we've seen
22 today.

23 Q. I now want to refer you back to
24 Exhibits 5 and 6, which were I believe the two
25 sales reports you testified to earlier today.

1 **A. Okay.**

2 Q. Do you recall being asked what the
3 differences were between Exhibit 5, which was the
4 first sales report that was produced, and
5 Exhibit 6, which ends in Glasscock 1772, which was
6 the sales report that was recently produced?

7 **A. I do.**

8 Q. And if we take a look at the
9 explanation page for Exhibit 5, I want to direct
10 your attention to the section that says Model, and
11 it says, Only P320. Do you recall testifying as to
12 what that term meant?

13 **A. Yes.**

14 Q. Do you know whether Only P320 meant
15 that this particular report also excluded versions
16 of the P320 that were either an M17 or an M18?

17 **A. I believe it does exclude that.**

18 Q. Okay. And then I believe you were also
19 asked what -- in the section that's called Order
20 type you were also asked what customer service
21 order type means. Do you recall that?

22 **A. I do.**

23 Q. And I believe you testified at the time
24 that you thought it related to some sort of
25 customer service inquiry, is that correct?

1 **A. Yes.**

2 Q. Would it be accurate to say that that
3 customer service order type could also involve
4 sales through Sig's custom works program?

5 **A. Yes. I did not take into consideration**
6 **the term customer service versus custom works, but**
7 **it could include custom works sales direct to**
8 **consumers.**

9 Q. And, okay, I think you've answered my
10 question. But just so the record is clear, what is
11 custom works?

12 **A. Custom works is our sort of our**
13 **high-end gun department, and we have your**
14 **build-your-own-gun portion of our website where**
15 **consumers can go directly on the Sig Sauer website,**
16 **they can use a configurator to configure a gun,**
17 **and that gun can be shipped directly to the**
18 **consumer.**

19 Q. Thank you. And now I wanted to just
20 refer you back to Exhibit 3 that you saw earlier
21 today, which was Glasscock 199. It's a letter, To
22 whom it may concern relating Boston Channel 5 WCVB
23 news report that was on the CANSOFCOM incident, do
24 you recall that?

25 **A. Yes.**

1 Q. Do you recall if CANSOFCOM conducted an
2 investigation on the incident?

3 A. Yes, they did.

4 Q. And do you know what the result of that
5 investigation was?

6 A. Yes, the outcome was that it was user
7 error. And we knew that at the time, which is why
8 we got the CANSOFCOM and asked if we could make a
9 statement. Because they could not make a statement
10 until they conducted their investigation, although
11 they knew at that time it was likely user error.

12 We collaborated with them to make this
13 statement, and a day later followed up with their
14 own statement confirming it was user error.

15 Q. And when you say user error, what do
16 you mean?

17 A. That the gentleman in CANSOFCOM, the
18 Canadian Special Forces, had discharged his gun
19 with his own -- he pulled the trigger.

20 Q. Now I just want to refer you back to
21 Exhibit 4, which was a draft of potential response
22 to the ABC News, Good Morning America and Nightline
23 pieces, do you recall that?

24 A. Yes.

25 Q. And do you recall being asked about the

1 first option for the beginning of your draft
2 response, which referred to ABC News as an antigun
3 media outlet?

4 A. Yes.

5 Q. Did you ultimately watch the final Good
6 Morning America segment?

7 A. I did.

8 Q. Did you also watch the Nightline
9 segment?

10 A. I did.

11 Q. And based on the segments that were
12 aired, did you conclude whether it was biased?

13 A. We felt it was very biased, because in
14 the Good Morning America piece ABC News -- ABC
15 News' own gun expert opined that he didn't feel
16 like the gun could go off by itself. And he went
17 on to say that the only reason he could suggest
18 that the gun allegedly went off by itself was
19 something that he termed legal momentum, and, you
20 know, obviously he was just saying that lawyers
21 have perpetuated the story that the gun can go off
22 by itself is what he was referring to.

23 When we watched that we were surprised
24 that he said that, but when we watched the
25 Nightline piece a little later in the day or a lot

1 later in the day, ABC News had edited the expert's
2 comments out of the piece, omitting -- omitting
3 that he said the gun likely couldn't go off by
4 itself and that the reason for alleged discharge
5 was legal momentum.

6 So they edited that piece out, so that
7 led us to being -- believing that it was biased
8 because they changed their story based on the later
9 understanding that that was not working in their
10 favor.

11 Q. And are there any other articles or
12 media that we've discussed today in the deposition
13 where you felt that the media organization didn't
14 incorporate facts that you presented as part of
15 your discussions with that organization?

16 A. I think the most egregious situation
17 was the Washington Post/Trace story where we really
18 decided to go all in and provide as much
19 information as we possibly could, you know, pages
20 of information.

21 And essentially they chose to either
22 ignore it or even edit video footage that we had
23 sent them to try to tell their story the way they
24 wanted to tell it.

25 And, you know, it was quite frustrating

1 to be -- to say, okay, fine, we're going to go in
2 and we're going to provide them as much information
3 as possible only to have them either not use it or
4 worse, edit it in a way that told the story the way
5 they wanted to tell .

6 Q. And you referring to editing in your
7 answer. What do you mean by that?

8 A. For example, there was an alleged case
9 in Pasco County, Florida where a school resource
10 officer had made a claim that he was leaning on the
11 wall in the middle school cafeteria, and as he was
12 leaning on the wall the gun just went off by
13 itself.

14 And ABC News in Florida at that time,
15 different ABC News story, but ABC News Florida at
16 the time, reported the story as he said it, that
17 the gun had just gone off by itself while he was
18 leaning on a wall without touching the gun.

19 Unbeknownst to him, there was a video
20 camera in the cafeteria, and that video camera had
21 caught him actually not only touching his gun, but
22 fidgeting with his gun while he was standing within
23 feet of several schoolchildren.

24 We were a bit frustrated because the
25 department had to conduct and finalize their own

1 investigation, so we had to wait for them to do
2 that, but they eventually released the footage.

3 And essentially the officer was
4 clicking and unclicking his gun in and out of his
5 holster while standing, and two school lines full
6 of children getting their food in the cafeteria.
7 As soon as they released their investigation, he
8 was dismissed by the department for cause.

9 Q. And how did you --

10 A. And by the way, within that. That's
11 where -- sorry, I didn't finish the thought. ABC
12 News had edited that piece of footage, rather than
13 showing him multiple times holstering and
14 unholstering his gun, it showed him holstering his
15 gun and the bullet going off and striking the
16 floor.

17 So even within their own edit, I don't
18 think they understood what they were showing,
19 because the next logical question would be, why did
20 he have his gun out of his holster in the first
21 place?

22 So they tried to depict it as if he put
23 his gun in his holster one time, but he did it
24 multiple times. But anybody that knows anything
25 about gun safety would suggest, why in the world

1 would he have his gun out of his holster in a
2 school cafeteria full of children?

3 Q. And just so the record is clear, are
4 you saying that ABC News did this editing, or the
5 Washington Post?

6 A. This was when we sent that footage to
7 the Washington Post to help them understand how
8 something can be alleged when somebody says, I
9 didn't touch it, and then video footage proved that
10 he touched it, but yet they took that same footage
11 and they turned it around and tried to suggest that
12 he only touched his gun one time.

13 Their lack of understanding of guns
14 would be this -- to believe they didn't even
15 understand that they were almost helping our story
16 by saying, you know, you shouldn't be touching your
17 gun in the first place, but the point is that they
18 manipulated the video footage to try to tell their
19 story.

20 Q. And just going back to the ABC News,
21 Good Morning America and Nightline pieces, did they
22 feature a particular individual who had experienced
23 an unintended discharge as part of that broadcast?

24 A. Yes, they did an extensive interview
25 with Officer Hilton from a police department in

1 **Texas.**

2 Q. And did Ms. Hilton sue the company?

3 **A. She did.**

4 Q. And do you know how that case
5 ultimately was resolved?

6 **A. The case was dismissed in Sig Sauer's**
7 **favor.**

8 Q. Now I just want to refer you back to
9 Exhibit 22, which we were talking about a little
10 bit ago, the CNN request to Sig Sauer. Do you
11 recall that?

12 **A. Yes.**

13 Q. And I want to refer you to Sig
14 Glasscock 202 in particular, your e-mail to Debi
15 Dawson. Do you recall that?

16 **A. I do.**

17 Q. Okay. Do you recall being asked why
18 you didn't just say no, but instead you said -- you
19 basically continued to respond and not just say no
20 right away?

21 **A. I do.**

22 Q. Do you recall that?

23 **A. Yes.**

24 Q. I want to direct your attention to the
25 part of your e-mail where you said, We had hoped to

1 navigate the release of this story to today, in
2 quotes, Friday. Do you see that?

3 **A. I do.**

4 Q. Is there any significance in marketing
5 to Friday publications?

6 **A. Yes. We prefer not to -- for us at Sig**
7 **we prefer not to do media releases on Fridays**
8 **because you're leading into the weekend when people**
9 **are distracted and doing other things.**

10 So for us, if there was a negative
11 story coming, we would have been trying to navigate
12 that to be able to have it released on Friday so it
13 would have less impact. So that was the purpose of
14 saying, trying to navigate it to Friday.

15 Q. And then if we go back to the first
16 page of the exhibit, there's an April 20th, 2018,
17 5:00 p.m. e-mail from Debi back to you and others.
18 Do you see that?

19 **A. I do.**

20 Q. And Debi's response appears to say, He
21 clearly has an agenda, dot, dot, dot, yup, two
22 exclamation points. Do you see that?

23 **A. I do.**

24 Q. What did you understand Debi to be
25 saying when she wrote that?

1 A. After she had reviewed the 28
2 questions, that she agreed that there was some
3 hidden agenda within -- within what's -- the story
4 he was trying to write.

5 MS. GULLIVER: Thank you very much.

6 THE WITNESS: Thank you.

7 MR. WILLIAMS: Can you read that last
8 question and answer back to me, please.

9 (Question and answer read.)

10 MR. WILLIAMS: I don't have any
11 questions.

12 MS. GULLIVER: Thank you.

13 THE VIDEOGRAPHER: This concludes the
14 deposition of Thomas Taylor. Off the record at
15 12:48.

16 (The deposition was concluded at 12:48 p.m.)

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25 SIGNATURE: _____ DATE: _____

CERTIFICATE

I, Pamela J. Carle, Registered Professional Reporter, do hereby certify that the foregoing is a true and accurate transcript of my stenographic notes of the deposition of THOMAS TAYLOR, who was first duly sworn, taken at the place and on the date hereinbefore set forth, and that reading and signing of the transcript was not discussed.

I further certify that I am neither attorney nor counsel for, nor related to or employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed in this case nor am I financially interested in this action.

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Pamela J. Carle, LCR, RPR, CRR